

facilities and amenities have been bought up by developers and converted for example into housing and retail. At the same time, the Council's UDP/LDF Annual Monitoring Reports of the last few years demonstrate that the vast majority of the housing which is being built is unaffordable or of inappropriate size to the local people who most need it.

We therefore believe that planning policies should be strengthened to protect and expand social infrastructure, and to ensure that the housing which is built is of the right type.

10. Faced with constant pressures for inappropriate or damaging development, residents want to ensure that we and future generations will live in strong, supportive and sustainable communities. Based on the experience and evidence of what is actually happening on the ground we are convinced that that the currently-proposed LDF policies, despite many good sentiments, need to be amended in order to protect community interests more effectively.

#### S106 PAYMENTS – ARE THEY EFFECTIVE?

11. The HFRA is concerned about the reliance on S106 financial payments, instead of physical planning gains. We are extremely worried that Haringey Council has become increasingly dependent on section 106 contributions to maintain ongoing basic services to our communities - in terms of the community facilities and amenities that are essential to sustaining communities - rather than as actual planning gain to mitigate the effects of development. We are worried both about the lack of funding for social and community infrastructure, and that section 106 is a powerful incentive for Councils and others to accept and support otherwise unacceptable planning proposals.

12. Further, in the current economic climate, it is clear that even this inadequate mitigation facility is being undermined by the Council agreeing to waive part or all of the s106 stipulations for a proposed development. This is unsustainable and benefits only the developers rather than the affected local communities. In the current economic situation, and indeed bearing in mind the recognised need for a transition to a low carbon economy and society, we believe that policies protecting the long term interests of communities need to be strengthened if we are to see the positive goals in the policies achieved.

#### GENUINE CONSULTATION, INVOLVEMENT AND EMPOWERMENT OF COMMUNITIES

12. We believe that the planning system needs to listen to, genuinely consult, and empower communities. Indeed, many local people are seeking to come up with their own visions and plans for derelict or contested sites, to improve their parks, to set up community gardens, or to manage empty buildings.

13. To adequately serve Haringey's peoples and communities we believe the draft LDF Core Strategy needs to:

- \* strengthen all the policies which protect community interests, social infrastructure, greater percentage of social housing and family housing, protect heritage, deal with climate change, reduce density limits etc etc
- \* ensure that these policies are binding on development, proportionate to the range of evidenced needs of the community, rather than something to be seen as just secondary or at most just to be 'balanced out' with developers' needs.
- \* support an 'evidence based approach'. If this is to work we believe there must be very firm policy guidelines and targets to address evidenced need, and that such need should guide all development rather than the current laissez-faire approach favouring the whims and profits of developers

14. We believe we need effective policies and guidelines to ensure that each development serves the requirements of those sections of the community with identified needs, with an appropriate balance weighted towards those in most need in order to address London's challenges and problems.

## B. SOME EVIDENCE AND EXPERT OPINION GENERALLY RELIED ON

15. On 19.10.2005, Haringey Council in its formal response (19.10.2005) to the Mayor of London over his draft North London Sub-Regional Development Framework - the most significant planning document affecting the borough since the existing London Plan was adopted, stated:

*'... the Council .....is concerned that the document lacks visible plans and proposals for essential infrastructure, such as transport, which is necessary to enable London to operate as a world class city.'*

*'It is considered that the document has missed the opportunity to promote greater sustainability by not addressing wider sustainable communities issues, such as homes for life, transport, social care services, access to community facilities for older people and equalities, including age discrimination. These are key quality of life issues for people living in London.'*

*'The Council is concerned that the phrase 'intensification should be sought across the sub-region' (paragraph 105) does not address the character of areas. .... Some areas of Haringey are suburban in character with relatively lower densities and it should be recognised that these areas provide a role in providing family sized housing. It would be helpful if the SRDF provided some analysis of future housing density in North London and provided maps of public transport accessibility and urban character.'*

*'The Council considers that the London Plan has prioritised housing provision without sufficient attention given to the need for necessary community, health and education infrastructure. For example, Haringey will experience particularly high growth in school numbers up to 2021, which will place considerable pressures on its existing schools. The Council is concerned that there may not be sufficient land to cater for a necessary increase in the number of health care services in the borough and such services will have to compete with other land uses, such as housing and employment uses.'*

*'The Council disputes the assertion in the draft SRDF that the anticipated increase in demand for health care will largely be absorbed by existing services (paragraph 65). Where is the evidence to support this claim? Also, the conclusion that primary care provision is inadequate to meet future demands contradicts this claim. It would be helpful if the SRDF identified the relationship between the development of Opportunity Areas or Areas for Intensification and other areas of significant housing growth and the location of planned or improved primary care facilities and location of school development.'*

*'The Council considers that significant additional public transport infrastructure and services are required to support housing growth and regeneration initiatives and to improve access to jobs for Haringey's residents. Although it is recognised in paragraph 121 that stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas, there is an absence of schemes in the draft SRDF to improve orbital movement or to improve key transport interchanges.'*

16. The above comments re-emphasise the Council's comments made as part of the formal consultation over the original London Plan itself. The LBH Executive Committee meeting on 17th September 2002 accepted the proposed response to the London Plan drafted by the LBH Director of Environmental Services. The Report to the Executive which was adopted, summarised the Council's formal response to the London Plan, stating [Para 3.7 of the Report to the Executive] that *'...it may be considered that it [the Draft London Plan] involves an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough.'*

The Report also noted: [Para 6.28] that:

*'the approach..... would impact upon Haringey residents' quality of life' .... 'and fails to provide a sustainable solution to housing demand in London'. 'The proposed housing target... would require more schools to be built, class sizes increased, pressure on community facilities and supporting*

*services' ... 'lack of land and funding for supporting services eg. schools' ... 'lack of engagement with local communities on bringing forward such a controversial proposal for high density housing development in advance of transport infrastructure.'*

17. The following comments were made by the London Borough of Haringey to the Mayor, 5.2.2010, regarding the Draft Replacement London Plan.

*London Plan does not clearly enough argue the case for growth or show how a growing population and sufficient homes can be accommodated in terms of community infrastructure*

*1.7 The London plan supported by its key delivery strategies does not show strategically how population and household growth will be supported in particular with adequate transport, health and educational facilities and the protection and growth of well located public open space. This strategic framework needs to be in place to give residents businesses and investors confidence that London will grow, but grow with quality services and environment.*

*2.1 The LP does not set out clear vision on how the proposed growth in London integrates with transport and other infrastructure in a way that demonstrates a comprehensive future spatial approach for the capital. The draft Plan is especially weak on delivery, infrastructure requirements and implementation.*

*2.14 The draft Plan sets new housing targets for Haringey as 820 units per year between 2011-2021. This is based on a London-wide study of Strategic Housing Land Availability Assessment Study. We understand that Haringey figures include sites already identified in the UDP.*

*2.15 However, we are concerned that the draft London Plan does not provide sufficient information on how this growth will be supported by necessary social, physical and green infrastructure, and Council would like more clarity and discussion with the GLA on this particular issue.*

*2.19 LP lacks enough evidence to show how community infrastructure will support the predicted growth. This assessment appears to be largely left to the boroughs. Whilst Haringey supports Mayor's new emphasis on "strong neighbourhoods", failure to show how growth can be accommodated in terms of infrastructure is very disappointing.*

18. Regarding some of the strategic matters, we have benefited greatly from, and may like to rely on, some of the expert opinion and evidence cited by the following organisations in their recent thoughtful and constructive responses to the current revision of the London Plan:

- London Tenants Federation <http://justspace2010.files.wordpress.com/2010/01/ltf.pdf>
- Friends of the Earth London <http://justspace2010.wordpress.com/welcome-to-just-space/submissions-about-the-plan/friends-of-the-earth-foe/>
- Just Space Network <http://justspace2010.files.wordpress.com/2010/01/just-spacelp.pdf>
- London Forum of Civic and Amenity Societies <http://justspace2010.files.wordpress.com/2010/01/london-forum-response1.pdf>

19. We would also like to formally support the responses to the current Haringey LDF Core Strategy put forward by:

- Friends of the Earth (Haringey Groups)
- Haringey Allotments Forum

20. In our own specific responses [**Appendix 2 – see separate attachment**] we have also adopted and adapted many of the points drafted by the Avenue Gardens Residents Association in their formal response to the Haringey LDF Core Strategy. We thank them for all their hard work in preparing their very detailed response.

*Dave Morris - Secretary, Haringey Federation of Residents Associations*

## Planning & Development in Haringey – A Residents' Conference (April 2010)

### REPORT

#### SUMMARY

On April 17th 2010 at Hornsey Vale Community Centre, N8, 40 Haringey residents from many local organisations and groups from all over the borough took part in a residents' conference on planning and development issues. Participants included residents associations, 'friends of parks' groups, conservation societies, local campaigns, environmental organisations, political groups as well as individual residents.\*\* The conference was organised by The Haringey Federation of Residents Associations, supported by Haringey's Friends of Parks Forum, Sustainable Haringey network, Haringey's Conservation Area Advisory Committees, Tottenham Civic Society and other local community organisations and networks.

*\*\* Members and reps of the following organisations attended: Selby Trust, Selby Wood Recycling Project, Pedro Achata Trust, Noel Park North Area Residents Association, Haringey Green Party, Bounds Green & District Residents Association, Chestnuts Northside Residents Association, Friends of Lordship Rec, Haringey Solidarity Group, Sustainable Haringey (including reps from a number of the SH working groups), Woodlands Park Residents Association, Tynemouth Area Residents Association, Alexandra Palace & Park Conservation Area Advisory Committee, Methuen Park Association, Haringey Living Streets, Warner Estate Residents Association, Hornsey Conservation Area Advisory Committee, Hawthorn Road Residents, West Green Residents Association, Muswell Hill & Fortis Green Association, Haslemere Road Residents Association, Tottenham Civic Society, InHaringey.co.uk, Wards Corner Community Coalition, Tottenham & Wood Green Friends of the Earth, Muswell Hill Friends of the Earth, Ferry Lane Action Group, Gladwell Landrock Cecile Park Residents Action Group, Jesus Hospital Estate Residents Association / Columbia Rd E2 Residents Association (Tower Hamlets), Bruce Grove Residents Network, Noel Park Conservation Area Advisory Committee, Stroud Green Residents Association, Stroud Green Conservation Area Advisory Committee, Save Ally Pally campaign*

The conference had been called to mobilise concerned community groups and residents to influence the borough's planning and development policies - known as the Local Development Framework - currently being re-written. The consultation documents set out very important policy proposals on how the borough will manage issues of housing, climate change, transport, employment, leisure, retail, open space, and design from 2011 to 2026. The documents were about to undergo 6 wks public consultation from May 10th to June 21st, following which they would be examined at a long and formal public hearing at the Civic Centre, presided over by a Planning Inspector.

Concerns were expressed about over-development and skyscrapers, advertising hoardings, loss of Haringey's heritage and character, threats to some green spaces, the selling off of community facilities and local pubs, and too much traffic. There were strong feelings that what Haringey's communities actually need, but are rarely getting, is genuinely affordable housing, well-designed buildings, good quality local jobs, community-led regeneration, safer, greener and more friendly local streets and better public transport, more green space and allotment sites, protection of public land and community facilities, safeguarding of small independent shops, and the long term sustainability of our society.

In the final session entitled 'Community Involvement and Empowerment In Planning - what we can do as residents', there were riveting and often inspirational presentations from some of the local campaigns

around Haringey where local residents are standing up for their communities against unpopular and inappropriate development, and sometimes creating their own alternative community plans for contested sites. These included Alexandra Palace, Wards Corner, Hornsey Town Hall, various local parks, and certain backland sites.

Participants pledged to continue to work together to ensure residents' voices will be heard loud and clear throughout the official consultation, and beyond.

## DETAILED REPORT OF THE PROCEEDINGS

*[Based on notes taken by Colin Marr]*

### Part 1. Introduction and background

Dave Morris, of the Haringey Federation of Residents Associations, chaired and opened the conference by welcoming participants. He went on to explain why the Local Development Framework (LDF), which replaces the Unitary Development Plan, is important and how in the past property developers (often with support from the council) had managed to exploit it to the detriment of local communities. In the last few years residents groups around Haringey have been increasingly taking up development issues, sharing their experiences and are increasingly aware of the need to speak out loud and clear. The HFRA had held a well-attended seminar about the LDF for over a dozen groups in June 2009 where it had been agreed a more substantial conference was needed.

The main purpose of the conference was:

1. To explain what the LDF is and what is involved
2. To outline the key issues – what needs to be changed?
3. How to respond to ensure we are taken notice of?

Officers from Haringey Council had agreed to attend in order to help participants understand the new and complex LDF procedures, but they had unfortunately been told to pull out at the last minute because of the forthcoming local Council elections. The coming 6 weeks consultation due to start on April 19th had also just been postponed - until May 10<sup>th</sup>. The revised start date is 10th May up to 21st June. A new schedule provided to the event organisers the day before (by Ciara Whelehan, Team Leader Planning Policy for the Council) explained some of the new LDF consultation timetable, and that in May/June the formal focus would be on the Core Strategy and not on the accompanying, related Development Management Policy document and the Sites Allocation Development Plans document. *[See Appendix 1 below – provided to all attendees]*. Consultation on the latter documents will be late 2010 - early 2011. The HFRA had been able to get 4 copies of the relevant documents in advance of printing so that the conference could view them.

Dave listed a few key planning questions identified by a pre-meeting of those helping organise the event. Issues included:

- **Heritage, and character of neighbourhoods** - are we protected, or are we going backwards?
- **Tall buildings** - are residential skyscrapers unacceptable, and if so what policies are needed?
- **Affordable Housing** - is the affordable % of new build homes too low, and in any case are they really 'affordable' to those who most need homes?
- **Sustainability and climate change** - this is crucially important, but do the policies impose strict enough conditions on all development?
- **Open space provision** - how do we protect open space of all kinds and ensure the deficiencies are addressed?
- **Community facilities in local neighbourhoods** - what policies would halt the loss of local shops, POs, local pubs, community centres, public land and other amenities etc etc.

- **Town centres and regeneration** - how can we prevent over-development and ensure that commercial interests do not undermine the needs of local communities?
- **The 'Sites Allocation' document maps** - need to be carefully scrutinised and specific sites or site boundaries challenged where inappropriate development is being proposed

Lucy Rogers, from Jesus Hospital Estate Residents Association / Columbia Rd E2 Residents Association in Tower Hamlets, spoke about their experiences there with the LDF, where they are further into the process than at Haringey. Tower Hamlets is currently involved with the stage where their LDF is subject to public hearings where the Council has to justify its plans to the Planning Inspector – this is the stage beyond setting the core strategy, which is what Haringey is now involved with. Key points from Lucy's presentation included:

- **The public hearings** are well attended by well prepared hired reps of property developers – they keep an eye on these things to ensure their views are prominent.
- **'Opportunities for growth'** generally means opportunities for developers! Residents need to work out ways to ensure other aspects of policy are strong, so as to resist the developers.
- **Residents need to work in issue-based groups** to submit their statements in a way that questions what the Council is doing – beware the Council's gobbledegook! The Inspector needs to be prompted to ask the council – do you really need this particular phrase or policy?
- **The council's 'sustainable community strategy'** is important and should be looked at closely, with a legalistic mind, and try to ensure that the core policies are tightly worded.
- **To ensure residents have a voice at the public hearings**, they have to put in their written submission at the core strategy stage (which in Haringey is now).
- **She praised Haringey's residents groups** for being well organised and co-ordinated compared to Tower Hamlets, and urged everyone to continue to support each other and work together.

Chris Mason, from Hornsey Conservation Area Advisory Committee (CAAC) and chair of the Haringey Joint CAACs, explained the background to the national introduction of the new LDF process, a result of the 2004 Planning Act, which replaces UDPs. Chris's key points included:

- **The LDF includes both strategic 'core strategies', and the more detailed day-to-day policies**, which are known as "Development Management Policies" (DMPs).
- **The draft core strategies** are in the main glossy document that Haringey is about to put out for consultation – we need to focus on the draft strategies that are in the 'blue panels'.
- **The DMPs** are in the second, less glossy document, which is incomplete and less well developed.
- **The concept of democracy in planning** has been built into the planning process since the rise of 'people power' aspirations and community groups from the 1960s onwards. There is now the need for a 'Statement of Community Involvement'. This is crucial to the process and there is a 'Test of Soundness' to see if the public has been consulted, that the policies are backed by evidence and are effective. [See Appendix 3 below - provided to all attendees].
- **The LDF is wider in scope than the old UDP** and includes other, more social, issues than just physical buildings / land development.
- **Guidance on the LDF process and issues** is on the Joint CAAC website: [www.des-con-hgy.org.uk](http://www.des-con-hgy.org.uk)

## **Part 2. Key issues - discussion groups / workshops, and feedback**

Discussion groups were arranged and separate break-out meetings held with the following feedback reports from note takers:

### **A. Sustainability and response to climate change**

Quentin Given's report included the following points:

- **Review of the old UDP** revealed weaknesses, e.g. transport policies

- **Population and economic growth** – the models used are poorly considered, but dominate current policies
- **Need to have stronger evidence-base** to influence policy decision-making
- **The high ‘churn-rate’ of people** needs to be considered
- **Friends of the Earth and Sustainable Haringey** have been pushing for better policies generally
- **Should we form a working group** to progress this subject area?

## **B. Transport and street scene**

Chris Barker’s report included the following points:

- **Overall aims of the policy are good**, e.g. promote cycling, walking and public transport
- **A night time lorry ban is good**, but could also go for lighter vehicles for deliveries
- **Policy to restrict/ban ‘crossovers’** (the turning of front gardens in parking spaces) needs to be tightened – it’s not specific enough
- **20 mph speed limit should be the ‘default’** for all the borough’s residential streets
- **Need for more cycle storage, routes and lanes**
- **More mixed residential and commercial development** could reduce the need to travel. We need ‘localisation of the economy’
- Plus there was a comment (afterwards from the floor): re-activate ex-Mayor Ken Livingstone’s idea of a **hierarchy of travel preferences?**

## **C. Open space and community facilities**

John Oakes’ report included the following points:

- **The policies need to adequately define the deficiency in open space** (parks, nature reserves, allotments, playgrounds etc) in areas around Haringey – and policies put in place to ensure such deficiencies are properly addressed by development. Now is the time to lobby for open space protection to be increased by re-designating many sites currently defined as ‘Significant Local Open Land’ to be upgraded to ‘Metropolitan Open Land’
- **Community facilities** (e.g. pubs and community centres) need to be better protected and increased in neighbourhoods.
- **Section 106 agreements** (financial payments and conditions on development) should be more demanding.
- **There is a need for community audits** to ensure community needs are defined and met
- **Where land is unused pending development** there could be a policy promoting the implementation of “meanwhile leases” to encourage temporary community use, e.g. for allotments, community gardens, play areas etc.
- Plus there was a comment (afterwards from the floor): Regarding s106 payments, **beware big developer’s money** being used to persuade the Council to accept otherwise inappropriate development.

## **D. Housing and development**

Joyce Rosser’s report included the following points:

- **There is a need to improve social infrastructure** (local community facilities and amenities) to support existing residents – growth will put even further stress on infrastructure.
- A map in the LDF documents shows that the **areas in the east of Haringey are the most heavily stressed**, but are still being earmarked for even more dense development
- There are currently **insufficient resources** to provide the community facilities needed
- **Section 106 agreements** need to be strengthened
- Properties being taken up as **buy-to-let investments** is still a problem
- **Key workers accommodation** needs to be better provided for

- **More affordable homes** for poorer families are needed.

## E. Design and conservation

Chris Mason's report included the following points:

- **Need to focus on Core Strategies SP10, 11 and 12** in the draft document
- SP10 includes a reference to **further development at Tottenham Hale**, which could hasten the demise of other 'heritage shopping centres', such as Tottenham High Road
- **There are lots of 'fine words' that need to be tightened up** – e.g. references to 'all new development', which might better be 'all development'. *[See Appendix 2 below]*.
- **The consultation documents are in a muddle over monitoring indicators** and other procedural irregularities.

## Part 3. Community Involvement and Empowerment In Planning - what can we do as residents?

Practical proposals coming out of the small group discussions included:

- **Working groups** communicating over specific subject areas are possible, convened by experienced activists eg Sustainability, Open Spaces, Heritage & Design.
- **The [www.Des-Con-Hgy.org.uk](http://www.Des-Con-Hgy.org.uk) website** is a community resource for all LDF information and liaison
- **Need to look at the maps given in the 'Sites Allocation' document** to consider and challenge some of the 'areas for change' designations – and to identify additional sites all over Haringey to lobby for positive community uses that will otherwise be overlooked
- **The need for good Guidance Notes** on how to make an effective submission – look for this on the Des-Con-HGY site. The Council should be circulating these, but it seems that the draft Haringey advice is poor compared to Camden's *[See Appendix 3 below]*.
- **The LDF documents** that are being consulted on will shortly be available from the council – all interested groups should try to ensure they obtain copies
- **We possibly need a further conference or meeting at end of May** to review all of this and finalise inputs.
- **A letter could be sent to the Planning Team** seeking to address some of our procedural concerns

The conference ended with brief reports from a few of the many inspirational local campaigns:

- **Wards Corner / Seven Sisters:** Carlos explained how the Latin American and other market stall holders, local family shops and members of residents associations in the area were working together to challenge the Council's plans for demolition and evictions, including holding large public meetings, protests and a forthcoming Judicial Review. They have created an alternative Community Plan for renewal and restoration of the site and are applying for planning permission. They have also made a film about their struggle. <http://wardscorner.wikispaces.com>
- **Ally Pally:** campaigners prevented a property developer from buying the site. The issue of governance of the Park and Palace is still being debated with the possibility of it eventually being taken over from the Council by an independent trust [www.saveallypally.com](http://www.saveallypally.com)
- **Backlands development:** report of a 10yr long residents' battle to prevent property developer Paul Simon building on a backland site in Crouch End [www.greenn8.org.uk/campaigns](http://www.greenn8.org.uk/campaigns)
- **Hornsey Town Hall:** local campaigners had campaigned successfully to save the Town Hall, but there are continuing controversies eg over the lack of a cinema, and the council promoting some private residential development on the site to pay for conservation of the main building. [www.crouchendforpeople.org/index](http://www.crouchendforpeople.org/index)



- **Tottenham Hale:** local residents groups formed an alliance to influence the massive development proposed in the area. Some of the plans have been put on hold by the recession, but may soon re-emerge. [www.webjam.com/ferry\\_lane\\_action\\_group/](http://www.webjam.com/ferry_lane_action_group/)
- **Lordship Rec:** The Friends group have spent 6 years lobbying for the community-led regeneration of a neglected park, and in partnership with the Council are on the verge of implementing £7m of improvements (depending on a successful lottery bid). There are many examples of other Friends Groups also improving their parks. [www.lordshiprec.org.uk](http://www.lordshiprec.org.uk)
- **Bounds Green and District Residents Association:** A rep explained that they are involved in a number of challenges to local planning applications. This served to remind the conference of the excellent ongoing work done by many local groups on a routine basis which doesn't usually get headlines but is nevertheless important.

The closing message from the Chair was that residents want to ensure that the policies which are meant to protect the interests of communities need to be strengthened and enforced, and that other policies favouring developers should be changed. Those who live and work in Haringey should have the maximum possible say over planning and development policies and practices that affect our lives, our communities and our neighbourhoods. As the Council prepares to consult over these matters let's call on everyone to raise their voices, together.

Notes by CM, 21 April 2010



**Haringey Federation of Residents Associations**

**Some Specific Comments and  
Representations to the  
London Borough of Haringey  
regarding their  
Core Strategy Proposed Submission**

*Issued by:*

**Haringey Federation of Residents Associations**

21 June 2010

**1 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.

1.1.13/2006

2 Issue/topic: Haringey in London and north London

Page Number: 9

Paragraph Number: 1.2.2

Policy Number:

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 seems an assumption that Haringey be defined as a 'growth' area. The HFRA feels that there has been an over-emphasis on new growth, especially of an inappropriate kind - expensive private housing, and industries which have failed to address sufficiently the infrastructure needs of either existing or new communities, or of the need to make a transition to a low/zero-carbon economy.

Economic growth of an unsustainable kind, which is considered by many to be the primary causal factor of the current climate change crisis, must be challenged rather than assumed to be some kind of unchallengeable benefit or public good.

In addition, in the light of the current economic crisis, are the projections for 'growth' even if desirable, realistic in any case?

26/2/1.2  
Sof

Suggested changes and revised wording:

Remove the word '**growth**' in the first sentence, and from other relevant paragraphs.

### 3 Issue/topic: Haringey's People

Page Number: 14

Paragraph Number: 1.3.1, Bullet 1

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”**. Also review other similar references in other paragraphs.

26/11/3  
508

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

Page Number: 14

Paragraph Number: 1.3.1, Bullet 4

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 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. ~~50%~~

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.

5 Issue/topic: Haringey at a glance

Page Number: 16

Paragraph Number: 1.3.2

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

There's nothing here about community empowerment.

Haringey Sustainable Community Strategy states, pp2-5: *'People will be at the heart of change. We will empower people, ensuring that young people and children are included, so they can participate in what is important to them. We want to see a dynamic and engaged voluntary and community sector to strengthen cohesion, inclusion and to help bring about improvements. Communities will see clear benefits from development and change, with people from all communities sharing and enjoying well managed, high quality, improved and accessible services and amenities, open spaces, schools and a plurality and diversity of first class leisure and cultural opportunities that everyone can share and use.'*

Suggested changes and revised wording:

Extra para before 1.3.2: **'Haringey has a mosaic of hundreds of community groups and networks of all kinds. This contributes to community spirit and cohesion, mutual aid, engagement, empowerment, representation, advocacy and the drive for improvements to services, facilities and the environment.'**

Add the words, to 1.3.3: These area assemblies **'and the range of local residents' groups and community organisations of all kinds set up by residents themselves,'** provide local.....

And after 1.3.3, another para: **'People will be at the heart of change. We will empower people, ensuring that young people and children are included, so they can participate in what is important to them. We want to see a dynamic and engaged voluntary and community sector to strengthen cohesion, inclusion and to help bring about improvements.'**

29/11/3  
8/10



6 **Issue/topic:** For all the 'Assembly' pages

Page Number: 18 - 38

Paragraph Number: 1.3.4 – 1.3.38

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

The word 'Assembly' in the headings makes no sense, as it doesn't describe an area but a particular Council meeting that some people attend.

Also each area needs to address deficiencies of various kinds of social infrastructure eg as evidenced by the 'key objectives' and Area Priority plans quoted in each section, and by the various deficiency maps at:  
[www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/policy\\_and\\_projects/local\\_development\\_framework/openspace\\_rec.htm](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm)

26/5/13  
→ X

Suggested changes and revised wording:

Remove the word '**Assembly**' from all 7 headings.

Add: '**Address and reduce deficiencies of open space and community amenities**' to each of the 7 sections.

7 **Issue/topic:** Wood Green Area Assembly

Page Number: 30

Paragraph Number: 1.3.28

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.

26/6/13  
572

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.**

**8 Issue/topic:** Population Change

Page Number: 39

Paragraph Number: 1.4.2

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.**

26/7/14  
S13

9 **Issue/topic:** Equality and Inclusion

Page Number: 44

Paragraph Number: 1.4.27

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:

In second sentence class and economic status is not mentioned yet is a key driver of discrimination and exclusion from opportunities.

Also, there is some very good points about the need for strong communities and facilities. This needs formalising as a coherent policy for 'Lifetime Neighbourhoods' as currently set out in the revision of the London Plan.

26/8/14  
515

Suggested changes and revised wording:

In second sentence, add the words: 'class, economic status' to the list of people's characteristics for which they should not suffer discrimination.

Add extra bullet pt:

- **'All Haringey residents should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent homes and public transport are affordable and accessible to everyone now and for future generations.'** \*\*

**\*\* An extra section is proposed:**

**'Lifetime Neighbourhoods'**

**A summary**

All residents should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent homes and public transport are affordable and accessible to everyone now and for future generations.

## **A 'lifetime neighbourhood' is one that has...**

### **Communal spaces, facilities, services and activities - well run, accessible, affordable and relevant to all**

- Community centres and meeting places that are accessible to all within our communities
- Amenities for young people and support for them to engage
- A wide range of social amenities and facilities accessible, affordable and inclusive to all residents in an area.
- Neighbourhood-based public services and facilities which are needed; e.g. for the range of health, education, leisure and economic needs. Localisation, not centralisation.
- Well-designed and maintained, car-free play spaces for children
- Well-equipped and well-managed public parks and green spaces
- Safe, green and living streets and public realm (including building frontages and interfaces).
- Accessible, affordable and extensive public transport links
- Respect for heritage and the conservation of the positive character of local neighbourhoods
- Access to allotments, food growing and community gardens
- A vibrant and relevant local economy, especially small workplaces and sustainable good quality jobs
- Local shopping parades and corner shops
- Funding for community-led projects and initiatives
- Nearby spaces and zones on the edges of communities for specific specialist needs, i.e. local town centres, major leisure facilities, green belt

### **Homes that meet our needs**

- Well-designed convivial estates and streets
- Adaptable 'lifetime homes' that can change as peoples' needs and family make-up changes, assessable to the elderly and disabled
- Good space standards; equivalent to or higher than 'Parker Morris'
- Allocations policies that recognise community needs and care for elderly
- Housing supply to reflect need rather than the market
- Affordability to be defined as a cost that anyone can genuinely afford
- High standards of management and maintenance of rented homes
- Positive investment in social and council housing

### **Good consultation, democratic accountability and empowerment of communities**

- Democratic and accountable structures that genuinely involve tenants at all levels of decision-making about our homes and communities
- Local authorities that engage in proper consultation. That means genuine involvement and empowerment, not information-giving sessions after the decisions have already been made
- Real involvement in decision making from initial ideas to final product, so that all residents have a sense of ownership
- Support for and development of vibrant local self-organised grassroots networks of social co-operation, solidarity and mutual aid

- Government that engages in proper consultation
- Tenants and residents will remain apathetic until councils and governments start to deliver
- People who live in a community have full control over what they need.
- All residents to have a sense of ownership of their communities, including the widest possible consultation and democratic accountability including young and old, disabled and BME residents
- Residents to be consulted, drive the agenda, own and run the process there after
- Funding to enable residents to represent themselves and govern their own communities
- Investment in communities to ensure that all can take part and community needs are addressed
- Recognise and support natural, organic communities and networks, rather than impose artificial boundaries
- Social and environmental sustainability of neighbourhoods
- Long-term, joined up thinking for community benefit.

10 **Issue/topic:** Vision

Page Number: 48

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

- Economy. It will be essential that the economy has made the transition to a low/zero-carbon one if we are to avoid catastrophic climate change.

- Safer and healthier: The central role of a strong community/neighbourhood is missing!

26/9/15  
SJK

Suggested changes and revised wording:

Add: Heading: Economic '**sustainability**' (not 'growth')

Text: add ... sustainable in terms of '**economic and environmental renewal focused on low and zero carbon products and services**'...

Add:

**'Lifetime Neighbourhoods**

**All residents enjoy a good quality environment in an active and supportive local community. Communities are empowered and there are a range of local shops, social and community facilities, streets, parks and open spaces, local services, decent homes and public transport in all areas, affordable and accessible to everyone.'**

11 **Issue/topic:** key Principles

Page Number: 49

Paragraph Number: 1.5.5. 8th bullet pt

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Badly worded and does not address open space deficiencies

Suggested changes and revised wording:

... enhancing and improving access to **'green and open space, particularly in areas deficient in open space throughout the borough'**.

26/10/15  
S/L  
7



12 **Issue/topic:** Strategic objectives

Page Number: 51

Paragraph Number: 3rd pt

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Ambiguous on the need to address open space deficiencies

26/11/15  
518

Suggested changes and revised wording:

**'To promote, enhance and expand a network of....'**

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

Page Number: 54

Paragraph Number: 2.1.4

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.**

**14 Issue/topic:** Density

Page Number: 56

Paragraph Number: 2.1.8

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.

Second to last sentence should read: ....’ **however, densities above or below the relevant range’.....**

26/11/21  
SP

15 **Issue/topic:** Heartlands

Page Number: 61

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:

26/14/0.1  
821

Reasons for Not Compliant or Unsound:

Needs to comply with aims of increasing social infrastructure

Suggested changes and revised wording:

For both parts of the box add text: **‘Additional open and green space, play areas, allotments, and a range of community amenities and facilities**

16 **Issue/topic:** Tottenham Hale

Page Number: 63

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Needs to comply with aims of increasing social infrastructure

*26/5/13-1*  
*676*

Suggested changes and revised wording:

add text: **'Additional open space, play areas, and a range of community amenities and facilities**

**17 Issue/topic:** Wood Green Area of Change

Page Number: 66

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

*26/10/13, J*  
*see*

**18 Issue/topic:** Wood Green Town Centre

Page Number: 67

Paragraph Number: Aspirations box

Document is Sound (Yes or No): NO

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

26/1/21  
5/23

Reasons for Not Compliant or Unsound:

Needs to comply with aims of increasing social infrastructure

Suggested changes and revised wording:

**add text: 'Additional open space, play areas, and a range of community amenities and facilities'**



**19 Issue/topic:** Wood Green Metropolitan Town Centre

Page Number: 67

Paragraph Number: 3.1.18

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”.**

26/13/3,  
82/4

**20 Issue/topic:** Aspirations for WGMTC

Page Number: 67

Paragraph Number: Bullet 10 – night time economy

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...”**

*26/10/10  
825*

**21 Issue/topic:** Northumberland Park

Page Number: 69

Paragraph Number: 3.1.27

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 is a shocking form of discrimination against a working class community and also Council policies promoting affordable and social housing. Social housing, a major goal for housing targets, should be celebrated not criticised. Some areas of the borough have a much more 'unbalanced' mix of tenures, 'skewed' to owner occupation, but are quite rightly not attacked in the same way in the Core Strategy. Poverty and lack of opportunity (including greater access to facilities and amenities) of course need to be addressed, but this para reverses cause and effect. The 'tenure mix' doesn't cause 'worklessness' or the 'low levels of income', issues which should be addressed elsewhere in the Core Strategy.

26/20/2  
527

**Suggested changes and revised wording:**

The paragraph should be changed to:

**'Current housing tenure in Northumberland Park is predominantly affordable and social rented property.... etc .... and Love Lane to the West. [CUT: Only] 30% of homes in the area are owner occupied with over 50% social rented and 18% private rented. [CUT: rest of para]'**

**22 Issue/topic:** Northumberland Park

Page Number: 70

Paragraph Number: Aspirations box

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:

3.1.23 accepts there's virtually no open space in the ward. This project is an opportunity to carry out Council policy on this matter.

Suggested changes and revised wording:

Add extra point: **'Provision of a new green open space'**.

*Handwritten notes:*  
26/1/13-1  
S/S

**23 Issue/topic:** Seven Sisters Corridor

Page Number: 72

Paragraph Number: 3.1.35

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 has no meaning as currently written.

Suggested changes and revised wording:

Delete the paragraph.

26/22/3-1  
830

**24 Issue/topic:** Aspirations for the (Seven Sisters) Area

Page Number: 74

Paragraph Number: Bullet 3 – landmarks and legibility

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 bullet point seems directed towards Wards Corner, a site whose proposed development is contentious. The point is unsound because there has been massive opposition to it. No justification is given for rejecting the wishes of the local community

Policy must recognise sites that are in a Conservation Area and of historic significance to the entire High Rod. New development must be appropriate in that context, and serve to strengthen the local community.

Legibility is not an issue because of the number of existing buildings of good quality on the High Road.

Suggested changes and revised wording:

Revised text for Bullet 3:

**“The development of opportunity sites will match the quality of the best buildings in the Conservation Area, which gives the area its legibility.”**

26/11/3.1  
SP2

**25 Issue/topic:** Aspirations for the (Seven Sisters) Area

Page Number: 74

Paragraph Number: Bullet 2

Document is Sound (Yes or No): NO

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

26/24/9-1  
~~884~~

Reasons for Not Compliant or Unsound:

Area id greatly deficient in green space

Suggested changes and revised wording:

Add: .... .. social infrastructure, **'green space, allotments,'** and community facilities

**26 Issue/topic:** Aspirations for the (Seven Sisters) Area

Page Number: 74

Paragraph Number: Bullet 5

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

Reasons for Not Compliant or Unsound:

The demolition of the beautiful and historic Ward's Corner landmark building, destruction of the vibrant indoor Latin American market, removal of the many small BME family shops in the area, and loss of affordable housing to be replaced by expensive private housing with no affordable or social %, fails to conform to Council policies or the planning brief for the site. There is a very popular Community Plan for the area's renewal.

Suggested changes and revised wording:

Amend to: **'Wards Corner retention and renewal, protecting and enhancing the vibrant and varied local community and small traders, and returning the site to its historic glory as a landmark gateway.'**

26/5/21  
337



27 Issue/topic: Areas of limited change

Page Number: 75

Paragraph Number: 3.1.41

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:

Haringey as a whole is residential in character. Conservation Areas and heritage exists in both the east and west of the Borough – there are 10 CAs in the west and 17 CAs in the centre and east of the Borough (UDP 2006, Schedule 12).

Promotion of high quality places and conservation of heritage should take place wherever it occurs all over the Borough.

The obligation of development to respect the character of the surrounding areas should apply to all of the Borough and not just to the west of the Borough or ‘areas of limited change’

26/2.6/3-  
-538

Suggested changes and revised wording:

Revisions for 3.1.42:

First sentence: Replace ‘Many’ with ‘**Most**’. Delete “particularly in the west of the borough” and example areas Crouch End etc.

**28 Issue/topic:** SP1 Indicators of delivery

Page Number: 77

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:

1<sup>st</sup> pt: The type of housing is vital if objectives for relieving homelessness and overcrowding are to be achieved, and if land in short supply is not to be wasted.

2<sup>nd</sup> pt: Need to also support existing communities

3<sup>rd</sup> pt: Need to move towards a low/zero carbon economy if policy of 40% carbon reduction by 2020 is to be achieved

26/11/01  
559

Suggested changes and revised wording:

1<sup>st</sup> pt: Add **'including the maximum possible social and family housing'**.

2<sup>nd</sup> pt: Add: .... Programmes **'and community facilities to address current deficiencies and'** support new communities...

3<sup>rd</sup> pt: Add: Increase in **'environmentally sustainable, low carbon retail, commercial and industrial sectors'**.

29 Issue/topic: SPI Indicators of delivery

Page Number: 77

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 table of indicators for the success of SPI does not include any indicator or assessment for how well the character of the various development areas has been protected. In particular an assessment is needed of how the Conservation Areas and Heritage in and adjacent to the Areas of Change have been protected and enhanced after development.

26/22/31  
570  
/

Suggested changes and revised wording:

Add an indicator or assessment of **how well character and heritage has been protected and enhanced after development.**

**30 Issue/topic:** Housing

Page Number: 79

Paragraph Number:

Policy Number: SP2

Objective Number: Bullet 1 – density levels

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:

SP2 Bullet 1 states that new development will meet the density levels set out in 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.**

26/29/02  
SP2  
541

**31 Issue/topic:** Housing

Page Number: 79

Paragraph Number:

Policy Number: SP2

Objective Number: Affordable Housing

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

'Affordable' needs to be defined so that it is genuinely affordable to those who most need housing

Suggested changes and revised wording:

Define '**affordable**' (see section 3.2.17) so that it is meaningful term.

Pt 5. Add: ..... provide '**minimum**' 50% affordable housing on site.

26/30/p.2  
~~5/2~~  
9  
542

**32 Issue/topic:** Conversions

Page Number: 83

Paragraph Number: 3.2.13

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

26/3/13.2  
843

**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.

33 **Issue/topic:** Family Housing

Page Number: 83

Paragraph Number: 3.2.16

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 para fails to identify the full scale of need for family housing to be addressed.

Suggested changes and revised wording:

Revised text for 3.2.16:

**“There is an acute need for suitable accommodation for families in the Borough, especially for those who are on the Council waiting list (which also includes a higher % of BME family households). Responding to this shortfall is a priority for the Council.”**

26/02/22  
529

34 **Issue/topic:** Affordable Housing

Page Number: 83

Paragraph Number: 3.2.17

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 define 'affordable', indicate a target for affordable housing, either in aggregate or by size of dwelling, or indicate that the 50% target is a minimum if those in need are going to be able to access housing.

Suggested changes and revised wording:

Define '**affordable**', in such a way that the majority of people in need can afford to access the homes (ie as a realistic % of the London minimum wage, or of the average wage in Haringey/London...)

Add that that the target is '**at least 50%**'

Give indicative targets for affordable housing by size of dwelling as a result of the proposed policies.

*20/07/15  
SAS*



**35 Issue/topic:** Affordable Housing

Page Number: 84

Paragraph Number: 3.2.23

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 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

26/34/0.2  
84/6

**36 Issue/topic:** Affordable Housing

Page Number: 85

Paragraph Number: 3.2.21

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 need for 'mixed communities' needs to apply everywhere if it is not to be a discriminatory policy only applying in poorer areas (where in fact overcrowding and the need for affordable and social housing is high). Such a one-sided 'gentrification' policy is increasingly perceived as verging on social engineering, forcing poorer people out of their areas, without creating adequate additional opportunities for social and affordable housing in other areas.

Suggested changes and revised wording:

Add: ..... concentrations of deprivation **'or wealth'**.

2.8/55/22  
3.2

**37 Issue/topic:** Affordable Housing

Page Number: 86

Paragraph Number: Indicators

Document is Sound (Yes or No): NO

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

26/36/32  
279

Reasons for Not Compliant or Unsound:

Monitoring needs to identify the key outcomes sought.

Suggested changes and revised wording:

2<sup>nd</sup> pt: **'Minimum 50% genuinely affordable housing, including levels of social housing and family housing, on sites and borough-wide'**.

**38 Issue/topic:** Climate Change in Haringey

Page Number: 91

Paragraph Number: SP4

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:

To achieve a low carbon Haringey we will need to ensure that all sectors are fully engaged, including industrial and commercial sectors, and the rediscovery of community resilience. We also need to develop a positive vision of community engagement and empowerment (eg skills and resource-sharing), and the vital role of green spaces (biodiversity, heat minimisation, food growing potential etc).

Suggested changes and revised wording:

Additional pt 3:

**The Council will promote:**

- **the transition of existing and future commercial and industrial enterprises and sectors towards green low carbon products, services, production methods and materials, energy usage etc.**
- **a comprehensive public, commercial and industrial waste minimisation, re-use and recycling scheme**
- **reduction of car usage and other industrial, fossil-fuel transport usage**
- **protect and expand green space, tree cover, green roofs, retention of greenery in gardens, food production**
- **local community resilience and facilities to enable resource sharing and development of appropriate skills**

In addition we support the responses of Friends of the Earth (Haringey) on these and related issues.

1.4 / 18/9/2020

**39 Issue/topic:** Existing Housing Stock

Page Number: 97

Paragraph Number: 4.1.23

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

26/38/4.1  
5/1

Reasons for Not Compliant or Unsound:

The text claims that much of the housing today will be in use in 2026. This is incorrect. Practically all the housing standing today will be in use in 2026.

Suggested changes and revised wording:

Revised text: **“Practically all the housing standing today will be in use in 2026”**

**40 Issue/topic:** Indicators for policies 4,5,6

Page Number: 104

Key Diagram Number/Title: Indicators to monitor delivery

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:

An obvious monitoring target should be the number of tonnes of CO2 saved or CO2 consumption foregone by these policies.

Suggested changes and revised wording:

- Add: '**number of tonnes of CO2 saved or CO2 consumption foregone**'
- 5<sup>th</sup> pt: Add: % of domestic, '**commercial, public and industrial**' waste...
- Add: '**% of all domestic, commercial, public and industrial buildings insulated to acceptable standards**'
- Add: '**Number and % of green, low carbon jobs created**'
- Add: '**% reduction of car use**'

Handwritten notes: 4/16/2017

**41 Issue/topic:** Public transport

Page Number: 108

Paragraph Number: 4.4.8

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 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.

The problem is exacerbated by planning decisions for retail sites that do not recognise the issue of proper access routes for resupplying the outlets in these retail sites. The end result is Heavy Goods Vehicles plying our residential streets at all hours of the day and night, and gradually shaking our houses to bits.

Small improvements such as the surfacing of roads with quiet surface treatments would lessen the effects of noise and vibration.

The Borough could do much in terms of land use policies to address this issue, but chooses to do little.

**Suggested changes and revised wording:**

Additional text:

**“Limiting Heavy Goods Vehicles usage in local streets and minimising the impacts of traffic noise and vibration”**

26/40/41

553

**42 Issue/topic:** Public transport

Page Number: 110

Paragraph Number: Indicators

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:

Need to monitor car usage.

Suggested changes and revised wording:

Add bullet: **'Reduction of car usage (by % and number of journeys)'**

*Handwritten notes:*  
J. 7/14/22  
5/1



**43 Issue/topic:** Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

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 relationship of the housing policy SP2 does not cohere with the employment objectives, and policy SP8 would therefore be ineffective. The need is to increase employment yet this policy focussed solely on "employment land", here interpreted as "industrial". The only "safeguarded" sites are "industrial sites". The policy and reasoning set forward in page 120 neglects entirely

- a) support of home working
- b) creation of Hubs e.g. the Hub at Kings Cross
- c) encouragement to firms to relocate in Haringey to benefit from a workforce which has to commute to find employment

24/12/5.1  
SSS-61)

The policy is lacking in ambition for the borough. The evidence base is lacking; para 5.1.14 states 61,000 jobs (2006) but this figure excludes the self-employed. To not take account of the self-employed is a significant flaw for obvious reasons. It is from that group that new businesses are likely to be founded and grow. The authority does not even have a raw statistic in the plan. How can regeneration be supported if the likely source of initiatives is not understood or related to?

Suggested changes and revised wording:

Revise the policy to take into account the self-employed and home workers and to support initiatives to enable the employment base to be extended and expanded.

**44 Issue/topic:** Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

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

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:

This policy is inadequate: employment land should be more strongly 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.

SSP(2)

Suggested changes and revised wording:

Revise text to emphasise greater protection for employment land.

**45 Issue/topic:** Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

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

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:

Not enough emphasis on the need to promote a transition to a low or zero carbon economy

Suggested changes and revised wording:

‘Employment’: Add bullet at end: **‘Promote a transition to a sustainable, low or zero carbon economy’**.

SSS (3)

**46 Issue/topic:** Employment

Page Number: 119

Paragraph Number:

Policy Number: Green Industries

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:

There's no reference to the development of green industries, or the transition to a low or zero carbon economy. This is a long process and a full strategy needs to be developed as a matter of urgency if carbon reduction targets are to be achieved and catastrophic climate change is to be avoided.

*1.5/15/12  
S*

Suggested changes and revised wording:

**'The Council will promote the development of green industries, and the transition to a low or zero carbon economy. A 'Low Carbon Workplaces Transition Strategy for Haringey' will be commissioned as a matter of urgency.'**

**47 Issue/topic:** Town Centres

Page Number: 125

Paragraph Number: Protecting and enhancing Haringey's TCs

Policy Number: SP10

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Need to achieve improvements to the street scene

Suggested changes and revised wording:

Protecting and enhancing:

Add at the end of 3<sup>rd</sup> para: **'Opportunities will be continually sought for the enhancement and improvement of the public realm (eg widening of pavements, tree planting, creation of squares and open spaces, removal of clutter)'**

26/44/5.3  
~~44~~

**48 Issue/topic:** Distribution of Retail Growth

Page Number: 126

Paragraph Number: 5.3.10

Policy Number: SPI0

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 thrust of PPS4 is understood and supported but the ambitions to enable intensification of existing locations must be in place. In the case of WGTC, essentially a traditional 19<sup>th</sup> century linear High Street with poor access, there is a limit on how it can be sustainably developed so that it remains in balance with the area. As it stands, the impact of WGTC on its residential hinterlands is immensely negative – a visit on foot to the back sides (east and west) of the WGTC is recommended.

The conditions do not exist for compatible effective massive growth. The “growth” which has been seen in recent years has been of questionable benefit, to say the least, to the local population. A survey of the High Road of twenty years ago, or even ten years ago, would reveal a place of greater diversity and interest than now. There were no one arm bandit machines, there were practically no bookmakers, and there were fewer take-aways. There were shops which catered for a wider range of customers’ needs than now.

Policy is needed to redress the qualitative decline, and the interests of landlords (high rents) should not be allowed to squeeze out useful service providers.

Suggested changes and revised wording:

Additional text: **“Expansion of existing retail centres will have to be justified by reference to the diversification of the retail services which the development can bring and to be consistent with the improvement of adjacent, adjoining and hinterland residential areas, for example by well managed and appropriate safe delivery arrangements. The visual degradation associated with existing development is unacceptable and will not be repeated”.**

26/4/5.9

**49 Issue/topic:** Ensuring a Range of Shops and Other Appropriate Town Centre Uses

Page Number: 128

Paragraph Number: 5.3.13

Policy Number: SP10

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 logic of this para is upside down. Car ownership should not be seen as a way for the local population to avoid using local facilities! This para is entirely the wrong way round; the needs of the entire spectrum of the population need to be addressed. People will shop locally if their needs are reasonably met. The policy here colludes with car-use and is inconsistent with plan policy to reduce car use. If goods and services are in reasonable distance, people can choose to walk to them, be they car owners or otherwise.

Shopping facilities provided within the borough should contribute to sustainability enabling residents to access the full range of goods and quality of goods that they can reasonably expect in a major city. The policy of the Authority should therefore seek such diversity and range so that such needs are met and will not permit monocultural retail deserts (as WGTC is becoming). To achieve this objective the Authority should prevent some uses to dominate others. There is a problem when a High Street has very high rents adjacent to charity shops. The deficiencies in retail will be attempted to be addressed in applying policy.

26/46/5-  
677

**Suggested changes and revised wording:**

**Additional text: “The policy of the Authority will be to seek diversity and range of shopping facilities provided within the borough so that residents can access the full range of goods and quality of goods that they can reasonably expect in a major city. To achieve this objective the Authority will prevent some uses to dominate others”.**

**50 Issue/topic:** Town Centres

Page Number: 130

Paragraph Number: Improving our TCs

Policy Number: 5.3.22

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Need to achieve improvements to the street scene

Suggested changes and revised wording:

Protecting and enhancing:

Add at the end of 1<sup>st</sup> sentence: **‘Opportunities will be continually sought for the enhancement and improvement of the public realm (eg widening of pavements, tree planting, creation of squares and open spaces, removal of clutter)’**

20/47/53  
260



**51 Issue/topic:** Tall buildings

Page Number: 139

Paragraph Number:

Policy Number: SP11 – Design (Tall Buildings)

Objective Number: Bullet 4 – adopted masterplans

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 Bullet 4 posits an “adopted masterplan framework” to be in place under which tall buildings will be assessed. The Core Strategy should state what these masterplans are, to which areas and sites they refer, when they will be produced and where they sit in the LDF set of documents.

Without clarity in the Council’s thinking the Core Strategy makes the entire Borough a potential location for tall buildings. It is not possible to consider the adequacies or otherwise of the Core Strategy policies with this uncertainty.

Tall buildings are not appropriate for Haringey, for the surrounding communities or (in the case of residential tall buildings) for those who live in them. The Haringey UDP stated [Report Comment No 4.156]: ‘The prospect of the serious problems of poorly designed and managed tower rise blocks being repeated is ominous’.

Suggested changes and revised wording:

There should be no tall buildings in Haringey. In particular there should be no tall residential buildings. In any event, the policy should state here or elsewhere the locations the Core Strategy has in mind for tall buildings.

26/4/16  
861

**52 Issue/topic:** Tall buildings

Page Number: 139

Paragraph Number:

Policy Number: SP11 – Design (Tall Buildings)

Objective Number: Bullet 5 – CABE guidance

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 Inspector's report on the UDP 2006 required (para 2.214) that applications for tall buildings should be assessed against criteria that would include:

“(a) high design quality, (b) acceptable relationship to surroundings, (c) appropriate site size and setting, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL”

The Inspector required these criteria to be included after a thorough and careful consideration of the issues, and in particular of the impact tall buildings in the Areas of Change would have on Metropolitan Open Land.

The Council accepted the Inspector's recommendations in their entirety in UDP 2006 policy UD9. The Council has not justified why they have removed UD9 bullets (d) and (e) from the list of criteria in SP11.

Suggested changes and revised wording:

Include the UDP 2006 policy UD9 criteria, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL in the SP11 criteria for tall buildings.

1.9 / 167 / 92  
8.2

**53 Issue/topic:** Tall Buildings

Page Number: 141

Paragraph Number: 6.1.15

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:

Inaccuracy

Suggested changes and revised wording:

2<sup>nd</sup> sentence should read: The exception is Wood Green Town Centre where 'some' buildings within its core area...

26/50/6.1  
803

**54 Issue/topic:** Tall Buildings

Page Number: 141

Paragraph Number: 6.1.17

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 asserts that tall buildings will be considered outside of the two areas, Haringey Heartlands/Wood Green and Tottenham Hale. This is a departure from UDP 2006 that has not been justified by the Council.

There should be a presumption against tall buildings in Haringey. The character of the Borough would be quickly eroded. Tall buildings impose too much on nearby residents and this Borough is residential. This single fact makes the Borough unsuitable for tall buildings.

Does the Council have in mind locations for tall buildings outside the two Areas of Change? This is particularly unacceptable. The Council's thinking should be made public in the Core Strategy so that the adequacy of the policies can be properly assessed.

**Suggested changes and revised wording:**

Delete the last sentence of paragraph 6.1.17

67/926/51/k.1  
(1)

**55 Issue/topic:** Tall Buildings

Page Number: 141

Paragraph Number: 6.1.17

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 Inspector's report on the UDP 2006 required (para 2.214) that applications for tall buildings should be assessed against criteria that would include:

“(a) high design quality, (b) acceptable relationship to surroundings, (c) appropriate site size and setting, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL”

The Inspector required these criteria to be included after a thorough and careful consideration of the issues, and in particular of the impact tall buildings in the Areas of Change would have on Metropolitan Open Land.

The Inspector explicitly considered the effect that tall buildings in the Heartlands/Wood Green Area for Intensification would have on the Alexandra Palace MOL, going on to state (para 2.207) that:

679 (2)

“There is little doubt that inappropriately designed tall buildings in Haringey Heartlands could have an adverse visual impact on local views from both Alexandra Park and the surrounding residential area. There would thus be a requirement for any tall building in this location to be subject to very close scrutiny by qualified professionals”

The Council accepted the Inspector's recommendations in their entirety in UDP 2006 policy UD9.

The Council has not justified why they have removed UD9 bullets (d) and (e) from the list of assessment criteria in paragraph 6.1.17.

Further, the Core Strategy must make it clear that all the criteria apply to applications for tall buildings both outside and inside the Haringey Heartlands/Wood Green and Tottenham Hale areas. As it stands the text is ambiguous on this point.

Suggested changes and revised wording:

(1) Include the UDP 2006 policy UD9 criteria, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL in the assessment criteria for tall buildings.

(2) Make it clear that the assessment criteria apply to all tall buildings wherever they are proposed

(3) Delete the reference to tall buildings outside the Haringey Heartlands/Wood Green and Tottenham Hale areas, or if not:

(4) Provide site specific information as to where the Council may be willing to consider applications for tall buildings.

**56 Issue/topic:** Conservation

Page Number: 142

Paragraph Number:

Policy Number: SP12 - Conservation

Objective Number: SP12 – Bullet 6 – strategic view

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:

An additional bullet is required in SP12 to protect local views of importance. The Core Strategy recognises their importance in paragraphs 6.2.16, 6.2.17 and 6.2.18. *26/52/62*

Important local views have disappeared in recent years as a result of development, for example, the view of Alexandra Palace from Wood Green Common and the Wood Green Common Conservation Area. *181*

The Inspector's Report into the UDP 2006 chided the Council for dropping the list of locally important views present in the 1998 UDP (para 2.113), and encouraged the Council to act quickly to include a new schedule of these views into the UDP 2006 (para 2.121).

The Inspector forcefully made the point (paras 2.126 and 2.113) that the issues of the identification and protection of these views was too important to be left to lower level guidance (SPGs in this case).

Five years after the UDP Inquiry, Haringey still does not have a list of views of local importance. The Borough has gone backward since 1998. In view of the Council's lack of effectiveness and commitment to the issue, a bullet directly addressing views of local importance in SP12 is clearly justified.

Suggested changes and revised wording:

An additional bullet is required in SP12 to protect local views of importance and a statement to the effect that any applications for substantial development will be expected to assess views and impact until such time as the Council has a list of local views published. (A timetable for providing such a list should be established). This will give security to all parties in the process.



57 Issue/topic: Strategic and Local Views

Page Number: 147

Paragraph Number: 6.2.18

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

Reasons for Not Compliant or Unsound:

This paragraph asserts that Local Views will be identified in a forthcoming Conservation SPD.

Important local views have disappeared in recent years as a result of development, for example, the view of Alexandra Palace from Wood Green Common and the Wood Green Common Conservation Area.

The Inspector's Report into the UDP 2006 chided the Council for dropping the list of locally important views present in the 1998 UDP (para 2.113), and encouraged the Council to act quickly to include a new schedule of these views into the UDP 2006 (para 2.121).

The Inspector forcefully made the point (paras 2.126 and 2.113) that the issues of the identification and protection of these views was too important to be left to lower level guidance (SPGs in this case).

Five years after the UDP Inquiry, Haringey still does not have a list of views of local importance. The Borough has gone backward since 1998.

The Inspector was of the view that a list of identified Local Views was too important to be inserted into an SPG. Similarly, such a list is too important to be left to an SPD. The list should be in the Development Management Policies document: this is the appropriate place for criteria or factors for decision against Plan policies.

The production of the List of Local Views is now, after 5 years, a matter of urgency. The Council should undertake to meet a very near term deadline for the production of this list (as suggested by the Inspector UDP 2006).

Suggested changes and revised wording:

Revised text: **"The List of Local Views will be appended to the Development Management Policies, in time for Public Examination by the Inspector in October 2010."**

26/53/6:  
682

**58 Issue/topic:** Open Space and Diversity

Page Number: 148

Paragraph Number: 6.3

Policy Number: SP13 – Open Space and Diversity

Objective Number:

Document is Sound (Yes or No): NO

**Reasons for Not Compliant or Unsound:**

Open Spaces and allotments are far more relevant to 'Healthier people with a better quality of life' (exercise, fresh air, nature, relaxation & healthy food) than 'Safer for All' chapter.

**Suggested changes and revised wording:**

Move entire section to Chapter 07 - Healthier People with a better quality of life

26/54/6.3  
584

**59 Issue/topic:** Open Space and Diversity

Page Number: 149

Paragraph Number:

Policy Number: SP13 – Open Space and Diversity

Objective Number: Developers – Bullets 2, 5 and 6 – amenity space

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:**

Amenity space provision is related to deficiency criteria (among other criteria), which has to be in conformity with the current London Plan (2004). See the some of the standards relevant to Haringey (below)\*, including [attached] a more accurate version of the parks and green spaces deficiency map on page 157 (ie a version based on London Plan criteria rather than arbitrary LBH criteria). It should replace the one on p157.

26/55/62  
8/5

**Suggested changes and revised wording:**

- Bullet 2: Add at end: .... Standards SPD **'and London Plan criteria'**.
- Bullet 5: Change (first word): 'Seek', to **'Provide'**
- Bullet 6: Change to: 'Secure opportunities for additional publicly accessible open space especially in areas of open space deficiency, **eg** where the quality and amount of provision is poorer, as set out in **the London Plan.**'

This correct approach needs to be adopted throughout the LDF CS.

**\* HFRA General Comments re addressing deficiencies**

Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open space. In addition, using the Mayor's 'Guide to Preparing Open Space Strategies - best practice guidance of the London Plan' ['Guide'] there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. [See section 'C' below]

London Borough of Haringey Open Space Strategy- Action Plan (in November 2005), Objective 1.2, reads: 'To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.' 'Priority: High' 'Timescale: Immediate'. That Action Plan still applies.

The key points about using the officially recognised criteria for assessing deficiency (whether of open space, childrens play, allotments or whatever) is that:

- i. They are **minimums**. We have no objections to anyone aiming for *higher* standards for residents, but obviously a *minimum* standard is one that should not be undercut. Minimum standards are used to identify the *facts* of the true levels of deficiency local communities face.
- ii. They are **aspirational**. They are standards to *aim* for and *surpassed*, wherever and whenever the opportunity/possibility to do so arises.
- iii. They are **'trigger points'** which will lever in a range of new facilities, additional resources and improvements. Residents and the Council alike stand to benefit from ensuring the minimum standards are high, non-negotiable, fully adopted in the local LDF, and enforced robustly.

We know that our approach is the right one because we outlined all these points before to John O'Neill, Senior Planner at the Greater London Authority in June 2006. Responding to our concerns that at that time that Haringey Council was greatly underestimating the extent of open space deficiency throughout the borough, he replied (14.6.2006):

*'Yes you appear to reflect the approach set out by the London Plan. Just to clarify that the deficiencies are normally calculated for each of the categories in the London Plan public open space hierarchy (Table 3D.1) and that while the larger parks perform the function of smaller parks this is not the case vice versa. For example, a District Park will also perform as a Local Park but not the other way around.'*

*'As you rightly state the London Plan sets a benchmark for the provision of public open space across London and if the borough is deviating from that then it needs to set out a robust justification to explain why Haringey residents will have worse provision than can be expected in other parts of London.'*

### **HFRA Specific Comments re addressing deficiencies**

The LBH website has maps of areas of deficiencies for various types of open space:  
[http://www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/policy\\_and\\_projects/local\\_development\\_framework/openspace\\_rec.htm](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm)

It should be noted that some of the Council's definitions of deficiency don't reach London Plan standards so the actual areas of LP-defined deficiency are greater than shown on some of the maps. The following is a very brief summary/overview of some of these deficiencies:

#### **C1. Parks**

The Haringey UDP 2006 states: '*Haringey's open space falls below the National Playing Field Association's 2.43ha per 1000 of the population, standing at only 1.7ha*'. This is a substantial a shortfall requiring a increase of 43% just to meet minimum standards. LBH Open Space Strategy para 3.7 further recognises that Haringey residents have far less open space per resident (590 residents per ha) than the London average (363 per ha). Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open space. See the HFRA's own revised Green Space deficiency map [Attached], which should replace the one on p 157.

Note: The Mayor of London's 'Guide' [para 2.81] states: '*Boroughs should assess the amount of open space per 1000 population at the borough and ward level as a starting point for developing a local standard.*' To achieve minimum standards requires a massive expansion of provision.

## **C2. Allotments**

The LBH UDP recognises that there's 'an estimated requirement for up to 1552 plots of [additional] allotment land'. This represents an additional 31ha, according to the Atkins Assessment, on which this is based states [Atkins Vol 1, para 8.67]. However, Atkins Vol 1, para 8.55 states: 'The way in which plots are promoted and publicised also influences demand. At present very little active promotion and publicity has taken place'. Even to achieve the artificially low number of total plots required, every ward should have an average of around 175 plots (about 15 plots for every 1000 residents). [For example, the three wards in S.Tottenham currently have a combined total of 63 plots and hence require an additional 462 plots to meet needs]. There are only 63 plots for the whole of N15 and only 22 plots in the N4 area of Haringey. There are no plots at all in Bounds Green, Bruce Grove, Haringay, Hornsey, Noel Park and Northumberland Park wards. The only site in St Ann's ward has just 8 plots, and the one site in Tottenham Green ward only 21 plots, therefore residents in those wards have little chance of obtaining a plot near to them. There are in fact 11 wards in Haringey which have less than 0.24 ha of allotment space per 1000 residents.

## **C3. Children's Play Areas**

The NPFA minimum standard for children's play is 0.2-0.3ha outdoor equipped playgrounds and 0.4-0.5ha informal play space per 1000 population. ie 0.6-0.8ha children's playspace per 1000 residents. There should be a Local Area for Play within 60 metres of all homes, and a Local Equipped Area for Play (with at least 5 types of play activity equipment) within 240 metres. To achieve minimum standards requires a massive expansion of provision.

## **C4. Areas of Nature Conservation and Reserves**

As recognised [LBH OSS para 3..27] English Nature minimum standards recommend there be Local Nature Reserves of 1ha per 1000 residents - currently in Haringey there is only 0.16ha per 1000, therefore requiring a 7-fold increase. LBH OSS 3.28 recognises that the LPAC/GLA standard for areas of nature conservation value is a catchment area of 280 metres. LBH OSS 3.28 suggests this 'could potentially be addressed by creating additional habitats on sites where none currently exist'. While additional habitats on existing sites are to be welcomed, this will not come near to addressing the deficiency unless a substantial number of new sites are created.

## **C5. Outdoor sports pitches**

The Council's Open Space Assessment [The Atkins Study] recommends that the 'minimum standard of access to outdoor sports pitches within Haringey should be that "All households should be no more than 280m from an outdoor sports pitch in secured public use" To achieve this minimum standard requires a massive expansion of provision, including the creation of new green spaces.

**60 Issue/topic:** Open Space and Diversity

Page Number: 150

Paragraph Number:

Policy Number: SP13 – Open Space and Diversity

Objective Number: Developers – Bullet 1 – play space elsewhere

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:**

If the sense of this bullet is that Developers may substitute S106 agreements for their obligation (Housing SPD 2008, para 8.9, 8.10, 8.13) to provide play space within the developments they hope to build, this cannot be wise or acceptable.

The bullet should make specifically clear that it does not apply to Private and Community Amenity Space as specified in the Housing SPD 2008, para 8.9, 8.10. That is, there is an obligation to create adequate play spaces within the development as part of the basic design imperatives, plus also to contribute to public play areas outside or adjacent to the site.

*5/7/19  
SP13*

**Suggested changes and revised wording:**

Modify this bullet to make clear it does not apply to Private and Community Amenity Space obligations as specified in the Housing SPD 2008, para 8.9, 8.10, and that the required play space cannot be traded for other benefits via S106.

61 Issue/topic: Protecting our open spaces

Page Number: 150

Paragraph Number: 6.3.3

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 asserts that development on the Borough's designated open space will be permitted, provided it is small scale. Additional safeguards are required of the development as per UDP 2006 OS3:

- It does not detract from the site's open nature and character
- It positively contributes to the setting and quality of the open space

Suggested changes and revised wording:

Add the following criteria to the paragraph:

- **It does not detract from the site's open nature and character**
- **It positively contributes to the setting and quality of the open space**

26/5/16.3  
68/6

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

Page Number: 150

Paragraph Number: 6.3.3

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 opens spaces which are not designated, following the content of UDP 2006 Policy OS10 "Other Open Space".

*John*



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

Page Number: 153

Paragraph Number: 6.3.11

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

As stated in the last but one sentence, the LDF is an opportunity to 'upgrade' all open space to its correct classification based on the relevant criteria. This will ensure the best possible protection, in line with Council policies to protect and enhance such spaces.

26/58/6.3  
SJP

Suggested changes and revised wording:

End of para. Add: **'The Council will examine the quality of all the borough's green open spaces to determine if their quality, attributes and facilities mean their status should be upgraded to greater protection level – ie Significant Local Open Land to Metropolitan Open Land. If so, their status will be amended.'**

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

Page Number: 154

Paragraph Number: 6.3.13 - Allotments

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

See above regarding the need to protect, and increase the amount of allotment sites and plots throughout Haringey. In particular HFRA supports the views of the Haringey Allotments Forum on this matter.

There is a huge deficiency, and a increasing realisation at all levels of the importance (and popularity) of boosting food growing in cities for many reasons.

Suggested changes and revised wording:

**'The Council recognises the extent of deficiency of availability of allotment plots (eg that there was a shortfall of 1552 plots in 2003, and that very many wards have little or no provision at all) and will protect and increase allotment space and promote and encourage food growing throughout the borough.'** [Delete last sentence as superfluous].

24/5/16.3  
567

**65 Issue/topic:** Open Space deficiency

Page Number: 156

Paragraph Number: 6.3.19

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:

26 / 60 / 6.

**Reasons for Not Compliant or Unsound:**

See above response to SP13 regarding accurate definition of deficiency. The para wrongly defines deficiency as 'further than 280 and 400m from ANY FORM of open space', instead of 'from A LOCAL PARK' (ie >2ha).

528

**Suggested changes and revised wording:**

Replace Figure 6.4 with the HFRA's London Plan-compliant version. Amend para accordingly.

**66 Issue/topic:** Open Space deficiency

Page Number: 156

Paragraph Number: 6.3.20

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 correct definition of deficiency is imperative as it imposes an obligation on major development in areas of such deficiency to create new open space to address that deficiency, or to contribute financially to open space improvements.

**Suggested changes and revised wording:**

Amend last but one sentence to read: **'The Council will ensure that all major development will create additional public open space.'**

Replace the map with the HFRA version.

26/6/16.3  
39

67 Issue/topic: Open Space deficiency

Page Number: 158

Paragraph Number: 6.3.21

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 states that: "Options for increasing access to Alexandra Palace Park from Haringey Heartlands should be considered". This is a hoary old issue and it appears no progress has been made in its resolution. Far easier to ensure that the Heartlands development fulfils its obligations to create a new open space within its boundaries.

The impediment to access from Haringey Heartlands to Alexandra Palace Park is the Railway. Currently, the only crossing from the Heartlands to the Park is via a narrow subway tunnel under the Railway (the Penstock Path).

26/6.2./6.7  
288

The only options to "increase access" are to provide additional subway tunnels under the railway, or footbridges over the railway. These are likely to be very expensive items and involve many engineering issues with the Railway. Realistically, they are unlikely to come to pass. Such was the conclusion of the UDP 2006 Inquiry. Continuation of this policy without a clear idea of its solution is simply not justified and not effective policy.

The Core Strategy should amend the paragraph and state precisely what options are feasible, state what it is going to do about bringing them to fruition, and discard those options which are unfeasible. If no option is feasible, then that particular policy should, regrettably, be dropped. In any event, a new public park should be created within the site.

Suggested changes and revised wording:

Add new 3rd sentence: **'The Council will ensure that the Heartlands development includes an adequate new green open space that the centre of the borough can be proud of.'**

**68 Issue/topic:** Nature Conservation

Page Number: 158

Paragraph Number: 6.3.23

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

As demonstrated above in our response to SP13, the borough is deficient in nature conservation. SINC's and LNRs need full protection. The deficiency needs to be accurately defined, to recognised minimum standards.

Suggested changes and revised wording:

The sentence two-thirds of the way down the para should read: **'The Council will not permit development on SINC's or LNRs.'**

C.9/1  
9/1/27  
[Signature]

**69 Issue/topic:** Play facilities

Page Number: 159

Paragraph Number: 6.3.32-3 – Play facilities

Document is Sound (Yes or No): YES

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

Reasons for Not Compliant or Unsound:

This seems spot on.

26/6-16.3  
871

**70 Issue/topic:** Health and Well-being

Page Number: 163

Paragraph Number:

Policy Number: SP14 – Health and well-being

Objective Number: Bullet 3 – facilities

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:

Reasons for Not Compliant or Unsound:

As set out in the introduction to this response, the Council stated to the Mayor of London in 2005:

*'The Council considers that the London Plan has prioritised housing provision without sufficient attention given to the need for necessary community, health and education infrastructure. For example, Haringey will experience particularly high growth in school numbers up to 2021, which will place considerable pressures on its existing schools. The Council is concerned that there may not be sufficient land to cater for a necessary increase in the number of health care services in the borough and such services will have to compete with other land uses, such as housing and employment uses.'*

*'The Council disputes the assertion in the draft SRDF that the anticipated increase in demand for health care will largely be absorbed by existing services (paragraph 65). Where is the evidence to support this claim? Also, the conclusion that primary care provision is inadequate to meet future demands contradicts this claim.'*

Since then the population has grown.

Suggested changes and revised wording:

Bullet 3 should start: **'Protect the existing provision and support.....'**

1.6/9/22  
SR2



**71 Issue/topic:** Delivering health services and facilities

Page Number: 168

Paragraph Number: 7.1.21

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:**

It appears that Government policy is for PolyClinics not to proceed. The Core Strategy policy articulated in the paragraph is now not relevant. New policy is required.

26/6 2/7  
690

**Suggested changes and revised wording:**

New policy is required as it appears that Government policy is for PolyClinics not to proceed.

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

Page Number: 168

Paragraph Number: 7.1.22, 7.1.23

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:

**“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.”**

1.6/10/12  
82

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

Page Number: 168

Paragraph Number: 7.1.24

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 text on overcrowding and families should point out that conversions of family houses to flats has created the greatest loss of family housing in the Borough, and has thus contributed to the overcrowded condition of family accommodation in Haringey today.

The text should volunteer and support policies on limiting the number of conversions and removal of family accommodation, as per the Housing SPD 2008 Chapter 9, page 27-29, para 9.1 through 9.12.

26/68/7-1  
683

**Suggested changes and revised wording:**

The text should volunteer and support policies on limiting the number conversions and removal of family accommodation, as per the Housing SPD 2008 Chapter 9, page 27-29, para 9.1 through 9.12.

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

Page Number: 171

Paragraph Number: 7.1.34

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Map on p172 is not London Plan compliant – replace with HFRA version.

Also, should identify the deficiency of swimming pools, playing fields and indoor sports provision, as set out in the Council's maps B8, B9, B10:

[http://www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/policy\\_and\\_projects/local\\_development\\_framework/openspace\\_rec.htm](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm)

Suggested changes and revised wording:

Replace Figure 7.3 with HFRA version

Add the 3 maps B8, B9, B10 (above link). Note these in the second sentence in the para.

26/09/17  
S.13

75 Issue/topic: Health  
Page Number: 173  
Paragraph Number: SP14 Monitoring  
Document is Sound (Yes or No): NO  
- Is or Is Not Justified:  
- Is or Is Not Effective:  
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Needs to have effective monitoring targets

Suggested changes and revised wording:

Add extra bullet:

- **'Reduction of deficiencies of play equipment, open space, sports pitches, swimming pools, and indoor sports provision.'**

26/70/171  
SP14

76 Issue/topic: Culture and Leisure

Page Number: 175

Paragraph Number:

Policy Number: SP15 – culture and leisure

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 opening text of this Policy makes no mention of a whole range of cultural and leisure activities. They are worthy of support in this Core Strategy and are not linked to “Cultural Areas”.

Suggested changes and revised wording:

The opening text should mention these activities (playing music, evening classes, pub quiz shows etc). Replace the word “**through**” at the end of the first sentence with ‘eg’....

*2.6/14/12  
SP*

77 Issue/topic: Culture and Leisure

Page Number: 175

Paragraph Number:

Policy Number: SP15 – culture and leisure

Objective Number: Point 1 – development of following cultural areas

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 “following locations” listed in Bullet 1 have significant cultural resources for which the term “cultural area” is not appropriate.

The term “cultural area” should be dropped because most cultural activity takes place outside of any “cultural area” in a wide variety of venues: eg in live music/comedy/theatre/quiz pubs, churches, church halls, clubs, dance groups (children and adult), classes, flower arranging, gardening, cooking, choirs, schools music, libraries, steel drum bands, community centres, in parks... often in people’s own neighbourhoods or nearby.

This entire section indicates an absence of awareness of the range of cultural activities taking place in the Borough, and the value of a whole range of local and often small, human-scale community facilities and venues.

Suggested changes and revised wording:

Pt 1: Change ‘areas’ to ‘**quarters**’

Pt 2: Amend to ..... ‘...**new work spaces and social and cultural venues in all areas that support all kinds of formal and informal cultural and leisure activities.**’

New Pt 4: ‘**Support the development of Lifetime Neighbourhoods in all areas of the borough so that all sections of local communities are able to meet, interact, socialise and develop their creative talents together.**’

26/7/22  
875

**78 Issue/topic:** Arts and cultural activities

Page Number: 176

Paragraph Number: 7.2.5

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 state of repair of Wood Green Central Library is a disgrace, and does not show the Core Strategy's policy of support for Culture and Leisure in a good light.

Suggested changes and revised wording:

Additional text: **"The Library infrastructure is highly valued and the Core Strategy will ensure that much needed maintenance of this infrastructure will be carried out"**

2.6/5.6/92  
R



79 Issue/topic: Cultural Areas

Page Number: 179

Paragraph Number: 7.2.17 a

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

As before, there's a need to protect and support the development of local community and social infrastructure and amenities. By promoting Lifetime Neighbourhoods in all areas of the borough, all sections of local communities will be able to meet, interact, socialise and develop their creative talents together.'

26/7/17

876

Suggested changes and revised wording:

New Pt after 7.2.17: **'Support the development of Lifetime Neighbourhoods in all areas of the borough so that all sections of local communities are able to meet, interact, socialise and develop their creative talents together.'**

**80 Issue/topic:** Harringay Green Lanes

Page Number: 181

Paragraph Number: 7.2.24

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:**

As has been shown, by any criteria (Council, London Plan, other authoritative bodies) Haringey is deficient in a wide range of facilities.

**Suggested changes and revised wording:**

Change opening sentence to read: '**Haringey is deficient in a range of community....**'. Also refer to the efficiency maps referred to earlier (B8, B9, B10, and the accurate Open Space deficiency map.

2.7/5/19  
B9

**81 Issue/topic:** Culture & Leisure

Page Number: 182

Paragraph Number: SP15 indicators

Document is Sound (Yes or No): NO

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

Reasons for Not Compliant or Unsound:

Need adequate monitoring criteria

Suggested changes and revised wording:

Add:

**‘Address deficiencies in open space, leisure, sport and local community and social infrastructure’**

636  
26/7/17.2

**82 Issue/topic:** Community Infrastructure

Page Number: 184

Paragraph Number: 8.1.1

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 section on Community Infrastructure should not be in the chapter ‘Delivering and Monitoring the Core Strategy’. The Community Infrastructure is part of the Core Strategy to be delivered and the process of its delivery is the thing that should be monitored.

The current location of the Community Infrastructure policies and objectives gives the strong impression of it being an afterthought, which cannot be the intention.

The Community Infrastructure policies and objectives themselves should be elsewhere in the document. The obvious place is in Chapter 7 (“Healthier People with a Better Quality of Life”, after “Culture and Leisure”).

**Suggested changes and revised wording:**

Move the section on Community Infrastructure policies and objectives to Chapter 7.

1-8/EE/202  
ROR

**83 Issue/topic:** Community Infrastructure

Page Number: 185

Paragraph Number: 8.1.2

Document is Sound (Yes or No): NO

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

26/28/8.1

Reasons for Not Compliant or Unsound:

Need to demonstrate that 'community facilities' is a broad term

637.

Suggested changes and revised wording:

Add to second sentence: .... community halls, and places of worship, **'local pubs, corner shops, youth clubs, libraries, GP surgeries and Post Offices.'**

**84 Issue/topic:** Community Infrastructure

Page Number: 185

Paragraph Number:

Policy Number: SP16

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:

It is noted that Haringey will work with its partners to ensure appropriate improvement and enhancements of community facilities. One example requiring attention: the condition of the exterior of Wood Green Central Library to the High Road is a continuing source of shame to the Borough; the condition of the Council buildings and their maintenance is nowhere referred to in this plan. Without repair the facility is endangered and therefore it is relevant to the delivery of the plan objectives.

1-8/24/2018  
839

Suggested changes and revised wording:

Add text at end to read:

**‘- Ensure its own facilities which house community facilities are well maintained and well used.’**

Also add:

**- promote and develop Lifetime Neighbourhoods throughout the borough**

**85 Issue/topic:** Community Infrastructure

Page Number: 196

Paragraph Number: 8.2.5, 8.2.6, 8.2.7

Document is Sound (Yes or No): NO

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

26/80/8.2

Reasons for Not Compliant or Unsound:

704

Paragraphs 8.2.5 through 8.2.7 on Community Infrastructure are in the wrong place ("Delivery and Monitoring"). They should be in the section "Community Infrastructure".

Suggested changes and revised wording:

Move Paragraphs 8.2.5 through 8.2.10 on Community Infrastructure to the section "Community Infrastructure", after para 8.1.2

**86 Issue/topic:** Key Infrastructure Programmes and Projects

Page Number: 216

Paragraph Number: Community Facilities

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:

Need to identify the desire to address deficiencies

Suggested changes and revised wording:

Add on the very last row:

**A range of community facilities and amenities (open spaces, nature reserves, allotments, play areas, leisure venues, various local community buildings and meeting places)**

**Aspirational, to address deficiencies.**

**TBD**








**TBD**

26/07/19 J.  
P.12



# ATKINS

LEGEND

-  Local Parks
-  200m Pedestrian Catchment
-  400m Pedestrian Catchment
-  OS Road Features
-  OS Water Features
-  OS Rail Features
-  Borough Boundary

PROJECT  
Haringey Open Space Study

TITLE  
Figure 4.2 - Pedestrian Accessibility  
Local Parks

SCALE  
1:50,000 at A4

DATE  
9th April 2003

