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Sent: 13 May 2013 00:19
To: LDF
Cc:
Subject: HFRA response to LBH Site Allocations consultation

Haringey Federation of Residents Associations
www.haringeyresidents.org

10th May 2013

To: Haringey planning policies team - ldf@haringey.gov.uk
From: Dave Morris - Secretary, Haringey Federation of Residents Associations

HFRA response to LBH Site Allocations consultation

1. Introduction

1.1 The Haringey Federation of Residents Associations (HFRA) is the umbrella organisation for the 180 Residents Associations throughout Haringey. We are an inclusive Federation, involving Residents Associations based in areas of public and social housing, as well as RAs based in areas of mixed tenure and ownership. Hence we cover all areas of the borough, and a wide range of key issues relevant to local communities generally.

We have been particularly heavily engaged with planning and development matters, including being the main community organisation present throughout the Haringey UDP Inquiry in 2005 and Haringey LDF EiP in 2011, and held a recent seminar in tandem with LBH planning officers to try to understand the current planning consultation process. We have also taken part in the London Plan EiP in 2010, including being invited by the inspector there to lead on social infrastructure debates.

2. The Draft Development Management Policies document itself

2.1 This 'LDF' planning consultation process is new and confusing. On the community side there's almost no-one we have come across who understands what is going on and how to influence the process or the decision-making over the policies currently out for consultation.

2.2 We had understood before the current document was released for consultation that it would be detailed Guidance for those involved in making, considering or responding to planning applications. In the Foreword by Cllr Strickland these policies are described as the *"real workhorse of our planning policies - used every day to make decisions on planning applications."*

2.3 In the seminar the HFRA organised with LBH planning officers in April 2013, those (mostly experienced) community reps attending asked many searching questions - despite genuine and detailed responses from the officers present, there was still great confusion. How is this document further Guidance in most respects? What is the role of the highly-detailed SPDs? What if they are not mentioned in this document? Are we being expected to trawl through the Local Plan to identify all the issues which are not referred to in the draft DMP? Are we being expected to flesh out all the

necessary details missing in the draft DMP?

It was revealed at the above seminar that a further draft DMP, with all the additional details and references needed for planning applications, will be produced and consulted over later in the year. Does this mean we should wait till then when there is a document we can 'get our teeth into'?

2.4 One example is the draft DMP's DMP21 Open Space. Haringey's Local Plan contains 9 pages of closely-typed text (Local Plan 6.3. SP13 Open Space and Diversity). This further guidance, the draft DMP, rather than provide any detail or any new points, contains only a page and a half of large print text. The text doesn't include hardly ANY of the relevant issues as set out in the Local Plan to do with Open Space, and nothing of substance on the issues it does briefly refer to.

In addition to the many omissions in this section, it should be noted that the reference in the Local Plan of a policy of reducing open space deficiency (6.3.20) has failed to translate in the draft DMP to any measures and criteria to achieve that, instead only referring to measures to 'prevent any further increase in open space deficiency'.

The Consultation Question at the end is: Have we identified all the issues in relation to Open Space? Do you agree with how we are going to address the issues in relation to Open Space?

Such questions are impossible to answer without an enormous effort to produce effectively a new and lengthy document.

2.5 We request that Council planning officers check to ensure all the relevant policy points in the Local Plan are included in the draft DMP, and with the full details necessary to enable meaningful comment.

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3. Overall policy objectives and outcomes

3.1 Everyone now recognises that we must have environmentally and socially sustainable communities throughout Haringey, London and the UK. The current planning policies for local boroughs and London claim to agree - but is this only lip service?

3.2 We are facing extreme pressures from private and corporate developers and town planners leading to a range of concerns & problems, and pressure on an already inadequate social infrastructure (schools, health facilities, parks, play areas, public transport, local pubs and community centres and other facilities etc). Some policies supposedly meant to protect the interests of communities are being systematically flouted by developers, Councils & the GLA.

3.3 Faced with constant pressures for inappropriate or damaging development, residents want to ensure that we and future generations will live in strong and sustainable communities. To that end we have had to stand up for our interests. Throughout Haringey (and indeed London) there are an ever-growing number of objections and campaigns over proposed local developments. Residents groups and associations are forming more and more alliances to resist what's wrong with major developments as well as smaller but equally important sites in local neighbourhoods.

3.4 We agree with the Our Tottenham network's submission to this consultation, that all plans, proposals, decision-making and developments should....

A. IMPROVE COMMUNITY FACILITIES:

- Protect and expand the 'social infrastructure' our communities value and rely on, including community centres, local pubs, corner shops, playgrounds, parks, GP surgeries, post offices etc
- All planning policies must ensure that Tottenham gets the best facilities to serve our communities eg protect and expand our local community-run community centres

B. CONTRIBUTE TO DECENT AND AFFORDABLE HOUSING FOR ALL:

- Ensure that new developments provide the secure, and genuinely-affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out of our borough
- All planning policies must ensure that there are adequate, genuinely affordable (for those on the lowest incomes) and long-term secure homes for all who need them, in contrast to current Council definitions and policies. At least 50% of all new homes should be genuinely affordable social rented housing. As a specific example, planning policies must support the residents of Love Lane Estate, and any other residents, threatened with possible relocation and demolition.

C. PROTECT AND SUPPORT SMALL BUSINESSES:

- Support local, independent, family shops and enterprises
- All planning policies must protect the needs of small businesses

D. PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE:

- Protect Tottenham's listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality
- All planning policies must: safeguard and value heritage buildings, including those outside Conservation Areas; ensure that heritage-led regeneration benefits Tottenham residents in the short, medium and long term, and doesn't lead to the kind of gentrification which forces people out of Tottenham. We also need to identify and improve quality of design, amenity and sustainability standards for all new development.

E. IMPROVE THE STREET ENVIRONMENT:

- Ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery
- All planning policies must ensure that: Tottenham's air quality is as good as in the West of Haringey; Maximise the spread of 20mph zones, car-sharing schemes, on-street cycle lock-ups, and pedestrian and cycling connections/networks across the borough; Promote options for street improvements, including Streets In Bloom, DIY Streets, Home Zones, Play Streets, improvements to front gardens, more benches and community-run notice-boards; ensure High Streets are re-designed more for people and less for cars

F. SUPPORT AND EXPAND YOUTH SERVICES AND FACILITIES:

- Encourage and support local youth speaking out for the services, centres and facilities they need
- All planning policies must: demand the best possible opportunities and funding due to young people (equal to the best practice elsewhere); support organisations who work with young people - in a way they are happy with - to deliver future services (using successful youth activities and projects as an example to emulate); Re-establish and open additional dedicated venues for young people to meet and socialise, that are adequately supported and resourced; Ensure young people can access the information and skills they need

G. EMPOWER OUR COMMUNITIES:

- Ensure real respect, engagement and empowerment for our communities and community groups so that they are driving the decision-making
- All planning policies must protect and create new spaces and hubs where people can meet and organise themselves, share skills and expertise; ensure that the local community is driving the decision-making

H. SUPPORT LOCAL COMMUNITY PLANS:

- Support local communities' own ideas and visions for their local sites & neighbourhoods eg the community plans for Bull Lane and Wards Corner
- All planning policies must promote and recognise community planning and community plans of all scales and at all levels – for sites, streets/estates, neighbourhood and Tottenham-wide.

3.5 The policies should be amended to reflect the above points and achieve the relevant objectives.

3.6 Most of the above points echo the HFRA's own submission during the drafting of the current Haringey Local Development Framework / Plan in 2011. It was, and still is, the HFRA's view that the key objectives and policies of the Local Plan documents (including the one subject of the current consultation) should...

- a. protect heritage and conservation features & the distinctive character of neighbourhoods
- b. resist unwanted over-development imposed on communities
- c. oppose over-intense housing development - densities have risen massively in the last few years, and there is a systemic failure by Councils and the GLA to enforce maximum density limits
- d. support genuinely affordable housing – the vast majority of housing development is unaffordable to local people in need. A scandalously low % of new homes completed in Haringey and London were social housing (the only genuinely 'affordable' housing), despite housing need being used as 'justification' for otherwise unacceptable policies. [See below for more comments regarding housing issues]
- e. protect valued 'backlands' sites
- f. defend open green space from development, especially undesignated sites
- g. address the widespread deficiencies of green open space of all kinds
- h. defend and expand children's play facilities in our neighbourhoods
- i. oppose poor project design
- j. defend community facilities eg. healthcare sites, local shops, post offices, meeting places, community pubs. Publicly-owned land is continuing to be widely sold off for private development.
- k. campaign against the sell off of ever more publicly-owned land
- l. halt the loss of affordable offices & sites for voluntary groups & small businesses
- m. protect front gardens - concerns include the quality of street scene, pedestrian safety, flooding etc
- n. resist environmentally unsustainable development – eg energy use, materials, design etc. A comprehensive low/zero-carbon energy programme (insulation, alternative energy generation, 100% recycling etc) is needed for every home, building and workplace throughout London
- o. criticise increasing pollution - visual, air and noise
- p. campaign against the ever more illegal advertising hoardings and billboards
- q. remove street clutter
- r. implement effective traffic calming, 'living' streets & affordable public transport

s. call for greater (not less) resources for maintenance and improvement of public facilities, buildings & services

3.7 The policies should be amended to reflect the above points and achieve the relevant objectives.

4. Housing issues in particular

4.1 As we stated in the 2011 consultation, and with ever greater force and resonance today, housing issues are purported to be central to planning policies. However, we believe the draft consultation document fails to get to grips with most of the key issues.

4.2 The following have been repeatedly identified as the key concerns in Haringey and around London, and the policies should be amended to reflect these.

4.2.1 Over-high housing densities – do they undermine the need to ensure sustainable communities? Current social and environmental infrastructure is inadequate to deal with the needs of current population levels, let alone greater/denser population levels. People are entitled to good quality living space and access to gardens etc. Do we really want to see a return to the failed tower blocks & estates of the past?

4.2.2 ‘Affordable’ and social housing: the failure to reach even the very modest % targets from new housing completions. Most so-called ‘affordable’ housing is well out of the reach of the vast majority of those who need it, and should be radically redefined. Social housing is currently the only genuinely affordable, permanent housing and should be the majority of new builds (it is only a tiny %).

An additional point regarding Comments on DMP4 Balancing Housing Tenure, the terms used need to be clearly defined because in some recent developments such as Lawrence Road and Brook House they have been misleading: eg

- “Affordable” ?;
- “Private” ?;
- “Social rented” – does this mean “council and housing association rented homes for people on council waiting list”?
- “Affordable rent or sale” – does this mean “shared ownership – half buy/half rent”? If not what does it mean?

Re Para 8: It is not “a high concentration of social rented housing” that leads to worklessness, poor educational attainment levels, crime and anti-social behaviour. Up until the 1980s Tottenham had high concentrations of council housing without these problems. The causes include the loss of jobs and increasing poverty due to deindustrialisation and national socio-economic policies. The tenor of this paragraph denigrates and discriminates against Council housing and those who live in it, and is arguably illegal under Equalities legislation (through indirect discrimination against people who are strongly represented among Council tenants eg those with disabilities and those from black and minority ethnic backgrounds).

Re Para 12: In relation to redevelopments of existing homes the document says that there must not be a loss of housing and in particular no loss of family and affordable homes. Will this mean the same **type** of affordable homes?

Why is there no Haringey policy to build council houses as some other local authorities are doing (see The Economist 27 April 2013)?

<http://www.economist.com/news/britain/21576674-social-housing-quietly-making-comeback-estate-mind>

4.2.3 Do S106 agreements lead to actual planning gains? Community facilities and amenities of all kinds essential to sustainable communities (eg open spaces, childrens' play areas, health, education, sports, leisure and meeting places, local shopping parades etc) are not only failing to be extended to address existing deficiencies, let alone the ever greater population pressures, but are under threat and being eroded on a daily basis in local neighbourhoods and town centres alike. No amount of S106 contributions (or contributions from the future Community Infrastructure Levy fund) can mitigate such real effects on the ground.

4.2.4 What can be done about the failure to ensure that new build housing contains enough family-sized housing, especially family-sized genuinely affordable and social housing? In Haringey policies recommend adequate 3-bed, and 4-bed units but only a tiny % gets built each year.

4.2.5 How do we halt the spread of Houses In Multiple Occupation? Homes are being divided into ever smaller units, causing not only loss of much-needed family accommodation but also unacceptable over-crowding.

4.2.6 How do we ensure that all new housing, including all 'affordable' and social housing, is designed to conform to accepted, good quality standards – and to the positive character and heritage of neighbourhoods? This relates to the interior and exterior of every home, including impact on and contribution to the street scene.

4.2.7 How do we ensure that every substantial residential development contributes effectively to improving public open spaces and recreational facilities of all kinds? How do we protect smaller, informal green spaces?

4.2.8 How can we ensure that, in boroughs with serious land stress and competition, that all available land is earmarked for community needs - rather than for what developers can grab in order to make the most profit? Existing amenity land (eg for health services, education, and community facilities and services of all kinds) is being whittled away and sold off.

4.2.9 What can be done to respond to ever-increasing house prices, rents and insecurity? And could there be more effective action to prevent homes being left empty for long periods?

4.2.10 Bearing in mind the need for urgent and drastic cuts in carbon emissions to avoid dangerous climate change, what comprehensive policies and practices need to be imposed on all housing development eg regarding energy usage and generation, materials, design, space, greenery and green space, recycling etc? Developers are rarely paying more than lip service to these critical issues. Policies need to be very carefully appraised and strengthened regarding environmental sustainability.

4.3 The policies should be amended to reflect the above points and achieve the relevant objectives.

5. Summary

5.1 To summarise, it has been our experience that Haringey, London and UK planning policies, despite many good sentiments, are ineffective in protecting the interests of local communities and should be amended appropriately. Reasons include:

- The *policies* themselves
- The *interpretation* of the policies
- *Failure to ensure, commit to, and enforce, key policies which are supposed to protect community interests* (eg social infrastructure, open space, affordable housing targets, housing density limits, heritage etc) when contrasted with other policies (eg general house-building and large scale development)

- ***Enforcement of conditions and agreements***
- ***The lack of a level playing field*** between local residents & well-resourced developers
- ***The reliance on S106 payments (or a future Community Infrastructure Levy),*** instead of actual planning gains
- ***Objectors denied their right to appeal,*** unlike developers
- ***The need to listen to, genuinely consult, and empower communities***

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