

LADDER COMMUNITY SAFETY PARTNERSHIP

c/o Cherie'e, 455 Green Lanes, N4 1HE

lcsp@blueyonder.co.uk

About the LCSP

The Ladder Community Safety Partnership (LCSP) is an umbrella organisation, representing numerous Residents' Associations and Neighbourhood Watches, and aims to communicate the views and concerns of local residents in the Ladder and Green Lanes area of Haringey, as expressed in our regular monthly meetings and updates.

The LCSP has a large membership and it would obviously be impossible to reflect the views of every single one of our members. However, the following submission is carefully based upon comments made by our members

- a. At the Haringey and St. Ann's Area Forum on 21st January 2014.
- b. At the monthly LCSP meeting on 13th February.
- c. Via individual communications to the LCSP committee members over the past weeks.

Our members' overall concerns

A simple glance at the Draft Site Allocations Map for the south of the Borough reveals not only the size of the proposed development areas, but also the extent to which many are clustered together near Green Lanes:

1. St. Ann's Hospital site
2. Greater Ashfield Road
3. Vale Road/Tewkesbury Road
4. Arena Retail Park

In addition to these large sites, there are three further smaller locations, which also impact on the Green Lanes area:

5. Hampden Road/Railway Approach (planning for some 80 units underway)
6. Possible development use of Jewsons site in Wightman Road
7. Possible development use of BDC site, adjacent to Green Lanes

A combination of all seven of these proposals represents a massive development within a very small corner of the borough, in an already densely populated area. We are particularly concerned at the implications both for local infrastructure and quality of life of local residents.

In this context we note in the Saved UDP (UD3), it is clearly stated that development proposals should demonstrate that '*there is no significant adverse impact on residential amenity*' and that '*new development.... will not worsen the quality of life for those living and working in Haringey*'. It is difficult to see how the cumulative impact of all the proposed developments will be able to meet these fundamental criteria. It is vital that all these sites are assessed in an holistic way, taking account of their impacts on each other, and not just assessed in isolation on an individual basis, and also factor in the forthcoming impact of the huge Haringey Heartlands development just to the north. The latter will clearly impact on the traffic problems on Green Lanes noted below, as well as adding to the traffic and pollution on Wightman Road which forms the western boundary of Haringey Ward.

The Arena Rental Park, Site S4

Our members are particularly concerned about the nature of the proposals for the Arena Retail Park (S4), which are excessively ambitious and, we believe, totally unrealistic. For these reasons, and because the site has been the main focus of our members' concerns, the following comments concentrate upon this particular location, in the broader context of the impact on the area, before concluding in the light of the evidence and arguments presented.

Site Location

The Arena site is located off Green Lanes, on the border of Haringey Ward, and is only accessible

for traffic via Williamson Road. We would like to point out that the Royal Mail delivery office cited in the document was replaced last year by another large retail outlet, TK Maxx.

Traffic

This is an extremely busy shopping/leisure venue. Williamson Road is already so congested that staff are specially employed to deal with traffic problems. These staff have been threatened, and even assaulted, on occasions because the traffic congestion in and out of the site is so bad, especially in peak periods such as December.

Green Lanes itself is no better, and the traffic flow is further exacerbated by the no through routes for vehicles via either Hermitage Road or the Gardens roads. Green Lanes cannot cope with any more traffic in its present configuration. Any new development will undoubtedly bring greater traffic and hence further stress to the area.

This has been acknowledged by the Council itself in the Local Plan: Strategic Policies 2013-26, which states '*movement in and around the centre is an issue because of the high level of vehicles along Green Lanes*' (p107).

Air Quality

As noted in the Local Plan, '*the whole borough is an Air Quality Management Area (AQMA), and has particularly high levels of pollution from nitrogen dioxide and particulate matter. The dominant source is .. road transport ..*'(p138).

It is well known, via a variety of public health indices, that this problem is particularly relevant to Green Lanes, and the residents who already live both in the flats above commercial premises and in the adjacent Ladder and Gardens roads. Any major developments, on the proposed scale can only lead to a further deterioration of air quality levels of which, as you will be aware, Haringey Borough is already currently 88% higher than European approved levels for air quality. The monitor in Priory Park lowers this average: measurements in the east of the borough are often as high or higher than central London. A modelled map in Haringey's Air Quality Action Plan 2010-2018 shows that throughout Harringay Ward the *annual* mean NO₂ ug/m³ does not drop below 44 (40 is the EC annual limit). Harringay ward is by far the largest residential area in the borough with such a high NO₂ away from main roads. A PM₁₀ map shows Green Lanes/High Road to be worse than any roads except Seven Sisters and parts of Tottenham High Road.

Air pollution is linked to increased respiratory and cardiac disease, resulting in an increased death rate and a significant burden on medical services which are already overstretched (see section below).

Flood Risk

This is obviously a very topical concern. The site is in a Critical Drainage Area, which is self-evident given that the corner of Green Lanes and Williamson Road is already prone to sizable areas of water accumulation owing to poor drainage. The effects of a proposed underground car park are potentially very alarming with an unknown impact on the water table over the surrounding area.

High Density Housing

The site is not suitable for high density or high rise buildings. To suggest that up to 8 storeys could be achieved without any negative impact on existing amenity is frankly ludicrous. This is not an area of high rise development and the Local Plan makes it clear that it is not acceptable to put up '*tall and large buildings ... which are substantially taller than their neighbours*', and that '*Haringey is characterised by predominately low-rise (2-3 storey) residential suburban development across the borough, and 3-4 store developments in town centres*' (p112).

We all agree with that view. There are no 8 storey buildings in the immediate area in Haringey, where the preponderant structures are late Victorian terraces.

Open Space

It is disgraceful to imply that because Finsbury Park is nearby, there is no need to be concerned about

private open space in proposed future development on the site. This is a particularly cynical justification for a densely packed and unattractive development.

Public Transport

The buses along Green Lanes are already extremely busy and it is not always possible even to get on the very regular route 29 at certain times. Similarly tubes at Manor House and trains at Haringay are often full to bursting, with the concept of a 'rush hour' seeming to apply for ever longer periods of the day. The nearby large residential development adjacent to Manor House (LB Hackney) which is underway will of course add to these problems. Saturdays and particularly Sundays are also extremely busy for the transport system in the Green Lanes area, with buses regularly caught up in nose-to-tail congestion between the railway bridge and the St Ann's junction.

Medical Services

GP surgeries in the area are already seriously overstretched. It is extremely difficult to get an appointment to see a doctor, which in turn has contributed to overcrowding and lengthy waits at A & E departments. Only this month (February 2014) problems emerged at one of our local hospitals (N. Middlesex) with ambulances stacking up outside A & E before they could gain access. NHS England has revealed that the number of emergency vehicles waiting for longer than 30 minutes at the N. Middlesex has increased dramatically from an average of 12/week (Dec 2012-Feb 2013) to an average of 88/week (Dec 2013-Feb 2014). There have also been proposals to downgrade facilities at our nearest major hospital, The Whittington, and of course St Ann's is not a general hospital and two-thirds of the site will be devoted to housing, as noted in these proposals (S1).

Schools

It is well-known that there is already a shortage of places for children under 8 years old throughout the area. Locally, South Haringay Junior School (close to the Arena site) is having to extend to 3 form entry for Year 3 from September 2014, and there is a similar pressure on the Infants School to expand to cope with ever-increasing numbers. If this is the situation already, the problems which will arise as a result of the proposed developments can readily be imagined. Local schools cannot continue to expand on demand.

Conclusion

Residents fully appreciate the need for new development, especially housing, but it is the sheer scale and cumulative impact of so many proposals in a small and already over-crowded corner of the borough which is our over-riding concern; particularly when adequate funding for new infrastructure/facilities is so unlikely.

The council is proposing to construct a very large, high-density housing development at the Arena site, in the Green Lanes area context of:

- Serious traffic congestion
- Poor air quality
- Questionable drainage
- Over-stretched public transport
- Over-crowded surgeries, hospitals and schools

This in turn could well be accompanied by all the other adjacent and nearby site proposals, as noted in points 1 -7 on the first page of this letter. We believe that this is simply unworkable as a blueprint for future development in such a compact and already heavily populated area.

We therefore urge that the Arena Retail Park should retain the integrity of its existing name and remain a thriving shopping/leisure centre for the surrounding area. Given all of the other housing

development proposals (some of which are already well advanced, as at St Ann's Hospital and Hampden Road), the Arena plan is a proposal too far. It should be removed from the Site Allocations Document.

Ian Sygrave
Chair
On Behalf of the LCSP