

21-page submission by Natasha Sivanandan, local resident:

INTORODUCTION: THE CONCERNS ABOUT THE CONSULTATION PROCESS and the LACK OF TRANSPARENCY, ACCOUNTABILITY and LOCAL DEMOCRACY:

1. **Background to this consultation: local democracy and misrepresentation by the Council.** Before dealing with the “growing the economy” policy, I want to highlight the fact that this entire consultation process is based on a false premise based on a misrepresentation by the Cabinet, (that is, the 9 Labour councillors who have driven the AAP and chosen the preferred bidder, Lendlease, for the Haringey Development Vehicle, (HDV)), about the options available to local residents, businesses and so on.
2. The Wood Green AAP is currently the “Regulation 18 Preferred Option Consultation Draft”. This ‘preference’ refers to the **Council’s ‘preferred Option 4’** (also known as ‘Option 4: Significant Transformation’) presented in the 2016 plans.
3. During the 14 February to 31 March 2017 consultation period (extended to 28 April), Council officers and Councillors have made repeated reference to the “overwhelming public support” (and other assertions to that effect) for option 4 of the 2016 AAP. This, however, is incorrect and **highly misleading**.
4. Assertions of ‘overwhelming support’ are based on the 2016 consultation, see the http://www.haringey.gov.uk/sites/haringeygovuk/files/wood_greens_future_issues_and_options_consultation_report_0.pdf
5. The report confirms, (pages 3 and 27) that there were **only 1,688 comments** submitted, with **only around 270 in support of Option 4**. About 80 were “concerned” and a further 65 “unsure”, making Option 4 only marginally more popular than Options 1, 2, or 3, and certainly **much less than a majority**. It was 270 of 1,688 comments = **15%**! **The claim of ‘overwhelming support’ is therefore untrue, misleading and unsustainable.**
6. 1,688 comments collected from a population of approximately 267,541 (<http://www.haringey.gov.uk/local-democracy/about-council/facts-and-figures/statistics/population-estimates>) does not constitute “extensive” consultation.
7. A local resident who attended the 2016 consultation reported:

“I attended the consultation at the high road shop. The four boards were on display and a nice lady offered to explain it all to me. She worked for Haringey and there were also workers from Fluid. She showed me the boards and was very much encouraging me to vote for ‘the best’ ie option 4. She was very dismissive of my comments that I liked the library and other features. I queried where the people in

sky city would go and she said they would be rehoused somewhere. She had no details. She didn't show me that Caxton Road would be demolished. When I asked about where the river would be, as pictured, she said that was Venice and just there to give an impression. The man from Fluid said the purpose was to make Wood Green like Kingston on Thames, as that was top of the metropolitan centres in London and Wood Green is bottom. The aim is to get in shops with large frontages, I think he called it footplates, so that people come to Wood Green from other boroughs to spend their money, whereas now local people travel out to other boroughs for the shops.” Polly.

8. This appears to suggest the possibility that, **contrary to the aims of ‘consultation’** (assumed to be a neutral exercise in which the views of the public on a range of options are sought, and an objective decision on the outcome is based on those views), **the Council already had a preferred option** which they promoted during the consultation exercise and there was a bias towards option 4.
9. In addition it should be noted that the information provided to the public was unclear, limited and the terms in which matters were expressed, the generalised nature of suggested options, the lack of particularity led to lack of clarity of information so that **meaningful** or effective consultation was not achieved.
10. The procedure adopted in 2016 was methodologically, procedurally and substantively flawed so that the Council had no proper, evidence-based basis to assert that “Option 4 was the preferred option after extensive public consultation” as was stated by Cllr Goldberg at a meeting I attended. **This was a misrepresentation which is clearly in breach of the Nolan principles of standards in public life and as these statements have been repeated by other Labour Councillors supporting the HDV and the AAP, they represent a threat not only to local democracy but also to the integrity and legal basis of the current Regulation 18 consultation.**
11. Haringey Council have apparently accepted that the 2016 consultations were inadequate and that it was not sufficiently viable, on the basis of the data in the 2016 consultation report, to proceed with the process of making Option 4 policy. This necessitated running a second round of consultation, (this current Regulation 18 consultation), in which only one ‘preferred option’ is offered.
12. **In other words, the fact that we are only being offered one plan / option is a direct result of a fiction perpetrated by a group of Councillors in breach of their legal obligations and duties.**
13. As a result of public pressure, this consultation period was extended from 31 March 2017 to 28 April. This is an implicit recognition that those who would be most directly affected by the AAP did not feel they had had adequate information or time

to respond.

14. However, in a meeting on the evening of 29 March 2017, Cllr Goldberg said, in answer to my question, that even if the vast majority of all the people consulted about the AAP objected to it, the Council would **not** change the policy as they would do what they thought best for the borough. **This makes a mockery of the consultation process and of the concept of local democracy.** Only the Cabinet votes on these proposals and the Cabinet is just 9 Labour Councillors who seem hell-bent on carrying out their plans regardless of widespread local opposition. This makes this entire consultation process meaningless and ineffective and is directly **contrary to points 2.64 and 2.65 of the London Plain**, which I have set out later in this response.
15. The 9 Labour Councillors who make up the Cabinet are: Councillors Claire Kober (Chair), Peray Ahmet, Jason Arthur, Eugene Ayisi, Ali Demirci, Joe Goldberg, Alan Strickland, Bernice Vanier and Elin Weston. I live in Noel Park ward and my Cllrs all supported the AAP and the HDV: they are Cllrs Alan Strickland, Peray Ahmet and Stephen Mann.
16. There has also been a failure to inform and consult affected small businesses. I have been informed by Market Hall traders that they were told, (at a meeting on 5 April 2017 called at short notice by their landlord and held for just one hour which was inadequate time), that they will be decanted to the 5th floor of the Mall Car Park in June 2017 in order to make way for an Aldi store to be built where the current food, deli and meat and fish stalls are. They were informed that this is based on Aldi getting permission to use the former petrol station site on Mayes Road, (which has been empty for years), to become an Aldi car park. However, I understand that planning permission has not been given for the car park so it seems incredible to me that Aldi would want to go ahead and move in without a car park for shoppers, given the restricted parking in the area.
17. Some Market Hall traders told me that they had NOT been informed about the AAP and the Council policy to demolish / “regenerate” the Mall and were at a loss to know why they had not been informed of the AAP at the 5 April 2017 meeting. You cannot consult local people if they do not know about the AAP and a process of consultation.
18. It seems to me that by their acts and omissions, the Council are failing in their duties to consult, and this disproportionately impacts on groups protected under the Equality Act 2010, particularly black and ethnic minority (BME) small businesses. See also other points below.
19. Another example of the Council’s failure to consult and lack of transparency and accountability can be seen by the recent policy change, effective June 1 2017, regarding planning consultations. The Haringey website states: *“From 1 June 2017 consultation letters will no longer be sent for planning applications. Where there is a legal duty to consult, a site notice will be placed at each site.”*

POLICY 1:

- 20. My comment on Policy 1 “Growing the Economy”,** (policy 1 of 7). This is a general policy that underpins and impacts on all the other 6 policy areas under consultation and in fact my points cover many of the other policy areas.
- 21.** I object to this policy, particularly the plan to enlarge the town centre, not only because of the points made above but because in Council workshops / meetings with local people, such as on 29 March 2017, Beth Kay, Head of Regeneration, said that the Council wants to turn the existing shopping area into a Westfield or Brent Cross-type development and that such a scheme is based on the assumption that Crossrail 2 comes to Wood Green. She said they want the area to become a major Metropolitan Town Centre. I object because there is no guarantee that Crossrail 2 will come to Wood Green and the scheme is based on unrealistic, grandiose assumptions and non-evidence based assumptions. It is highly **unlikely**, (in the context of Brexit and the unstable economic conditions that will follow in the years after we leave the EU, and especially if we have a Conservative government elected in June 2017), that Wood Green will attract the level of investment from partners that the current AAP envisages. Cllr Goldberg himself admitted that the Council **hopes** it will attract partners – but a hope is not, and should not be, the basis of a plan for economic growth.
- 22.** It would be more realistic and achievable if the policy for economic growth built on current expansion / regeneration that already has approval. For example, as St William is developing the Heartlands area and there will be new homes and economic units there, the new residents will want to use the Mall and shops in the High Road and this will attract retailers and others to invest in Wood Green. Potential investors and partners will not see this as risky after the growth of the local population that will occur as a result of the Heartlands development.
- 23.** Therefore I think the policy should be to continue to work with St William to enhance their plan and ensure that it is delivered on time. In addition, instead of developing grandiose new schemes for which no partners are currently available, the Council should put ratepayers’ money and its time and resources into ensuring that the proper infrastructure is provided for the large growth of population in the Heartlands area.
- 24.** I propose **as an alternative**, that the Council help and support the formation of a neighbourhood forum so that we can develop proper, sustainable and realistic plans to enhance community cohesion and sustainability by building schools, health centres, GP and dentist and health centres and improving traffic flow, reducing pollution by building cycle lanes and ensuring that pollution levels comply with the law, which in some parts of Haringey, at certain times of the day, currently does not happen. In order to do this, we as local people can use the rights we have under the Localism Act 2011, (for more information see the Haringey website).

25. **The Localism Act 2011** introduced new rights and powers to allow local communities to shape new development by preparing a neighbourhood plan. In areas such as Haringey, where there are no town or parish councils, the Act allows neighbourhood planning to be taken forward by 'neighbourhood forums' composed of local community groups. These forums have the power to prepare neighbourhood development plans, that must be in general conformity with the strategic policies of the Local Plan, to be put to the wider community for approval by means of local referendum. It is the Council's role to agree the neighbourhood forum for the neighbourhood area and to help publicise and organise a referendum and examination of the neighbourhood plan.
26. I also object to the policy of an enlarged town centre because we already have "shops cafés, restaurants and other leisure facilities". Wood Green is never going to be a Westfield-type shopping area: part of its strength and cultural diversity lies in the vibrant mix of individual stall holders in the Market Place, the existence of larger chains such as TK Maxx, Pret A Manger, Boots and Primark in the Mall and other shops, restaurants and leisure activities on the High Road. It is entirely understandable that, as a result of the banking crisis and the economic downturn and the uncertainty caused by Brexit, etc that the High Road has become run down. Instead of the AAP, I propose a more realistic and cost-effective alternative developed by local groups and people with the support of the Council, as is possible under the Localism Act 2011.
27. In addition, I object to this policy because it involves knocking down the Mall and the Sky City housing and the Bury Road car park and the Page High housing association homes above it, and demolition of homes in Caxton Road, Mayes Road and Coburg Road, to make way for an unknown group of developers who are yet to be identified. This is highly speculative and risky and contrary to good financial practice. It is poor corporate governance.
28. In reality, I believe the Council's desperate push to get the AAP approved is the Council's way of "softening up" local people to agree to the plans in principle so that it can do a further deal with Lendlease, (now the preferred bidder for the HDV), or some other private developer.
29. **I object to the way that the Council intends to put 3 prime sites that are publicly owned, (the Civic Centre, Wood Green Library and New River / Station Road), into the HDV.** At a meeting on 29 March 2017, Cllr Goldberg also admitted that although the Council is transferring various sites, (Wood Green Civic Centre, Wood Green Library, New River building and nearby car park and a care home in Muswell Hill), into the HDV with Lendlease, Lendlease will not be providing any social rent housing in the Wood Green area, for example to those who are currently living in Sky City or Page High and who (under this scheme) will see their homes demolished. They currently pay social rents (either to the Council or housing associations etc) and Cllr Goldberg said that if the AAP is agreed he **hopes** housing associations and others will become partners in the future in order to

provide affordable homes and social rent homes. So Lendlease are going to get prime land and buildings in Wood Green to build homes that they can sell off in the private market and not have to provide any homes at a social rent. Nor do they have to provide any so-called “affordable” homes, (which are not affordable to Haringey residents as they are at 80% of the market value). This will turn these homes into buy- to- let investments so that local people will lose out because a large number of local people will not be able to afford the rents.

30. Therefore, as an alternative I propose the following should be the policy. (1)

We know that the Civic Centre has heritage value and can be enlarged / built on and extended, (see AAP). We know that, due to cuts, the number of council employees has fallen and far less room is needed to house them. So we should enlarge the Civic Centre so it can house the reduced number of council employees as well as the current meetings rooms etc. **(2)** We should redevelop the Station Road / New River sites so as to provide affordable housing in partnership with a housing association, and hand the homes over to the housing association (HA) in pursuance of the Council’s duties to those on the waiting list and those who are homeless. If these homes are owned by a housing association they will not be sold off because, (at least at present), there is no right to buy HA homes, though the Conservative Govt did recently run a pilot scheme to see if giving the right to buy to HA tenants would be viable. **(3)** Leave Wood Green Library as it is because it is one of the most used libraries in London, it has already had part of its space recently handed over to Haringey Council customer services and there is likely to be civil disturbances if the Library is closed, even on a temporary basis. This will not lead to community cohesion, but the opposite.

31. I agree to that we should have “Improvements to existing frontages that will make the area look better” but we do **not** need an enlarged town centre to do that. I therefore object to this proposal in the AAP. As an alternative, I propose a group of local people together with local businesses and the Council should develop a neighbourhood plan and work to find cost-effective ways of improving existing frontages. I already know a group of individuals who would be prepared to be involved. **This policy objective can be better achieved by a neighbourhood plan under the Localism Act 2011.** This is far better than the grandiose and unrealistic and risky schemes dreamt up by the authors of the AAP.

32. I object to the policy of developing Wood Green’s cultural quarter as envisaged by the AAP because there are better and more realistic and achievable ways to do this. I think the policy should be to assist existing local groups to apply for and obtain grants in order to develop the cultural quarter based on their assessment of their needs, particularly when the Heartlands scheme is being built and completed in the coming years. There will be a need for more cultural and leisure time provision as result of the St William / Heartlands development, which already has planning permission.

33. As for the policy objective of improving the evening economy, the AAP will not achieve this because the scheme is so large that the danger of projects failing is vast. Wood Green could be left with demolished sites and half finished projects that will not achieve the aim of regeneration, and leave Wood Green in a worse position.
34. Instead, I suggest that the evening economy will gradually grow naturally and organically as projects like Heartlands are completed and the economy eventually recovers.
35. Haringey is already experiencing a lot of uncertainty due to existing development such as the Heartlands area being developed by St William and the proposed large scale “regeneration” of the Seven Sisters Road area and the demolition of the Seven Sisters Market, which is fiercely opposed. I note that public planning meetings are due to be held in July 2017.
36. I object to the whole AAP which is predicated on Crossrail 2 coming to Wood Green and the demolition of the Mall, and the transfer of the publicly-owned Wood Green Library, the Civic Centre and New River. I object to the AAP because it aims to demolish existing homes in order to build new homes which will not be affordable.
37. The AAP is NOT in conformity with the **London Plan 2016**: for example, **policy 2.6** (Outer London: vision and strategy); **policy 2.14** (areas for regeneration); **policy 2.15 (C)** (requires developments should sustain and enhance the vitality and viability of the town centre and ensure diversity); **policy 3.1** (ensuring equal life chances for all);, policy 4.7 (reta.7 (opportunities for maximising economic growth and supporting viable local communities); policy 7.8, (heritage assets).
38. The AAP is in breach of the London Plan’s aim to take account of local context, design and transport capacity, see point 3.28 of the London Plan which states:
- “**3.28** A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – **local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6)**. (emphasis added). These broad ranges also provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDF. Where appropriate, they can also provide a tool for increasing density in situations where transport proposals will improve public transport accessibility in the future. **It is important that higher density housing is not automatically seen as requiring high rise development.**” (emphasis added).
39. I object to the AAP on grounds that it is contrary to point 2.64 and 2.65 of the London Plan (policy on regeneration), which states:

“2.64 Working with local partnerships, public sector agencies must balance the need for local responses with the need for consistent and targeted public sector intervention across the capital. **The Mayor will expect regeneration programmes to demonstrate active engagement with residents, businesses and other appropriate stakeholders.**” (emphasis added) and take account of the “Lifetime Neighbourhoods (Policy 7.1), taking account of stakeholder aspirations for the neighbourhoods concerned, and for the wider area affected. **Options that maximise new opportunities for those concerned to participate in the delivery of programmes and initiatives shaping neighbourhoods will be encouraged. Consultation and involvement activities should also seek to empower communities and neighbourhoods, and support development of wider skills.** (emphasis added).”

40. In addition, the London Plan states: **“2.65** Relevant plans should include a programme for implementation of policies and proposals **designed to minimise disruption of the communities and businesses affected.** (emphasis added).”
41. **Last, but by no means least, the AAP breaches the Council’s public sector equality duty.** Over 60% of Haringey’s population is non-white and it has an increasing number of people with disabilities including mental health and learning disabilities, (see Haringey’s own population statistics). It is also a “young” borough, with increasing needs for schools, health centres, open spaces and play areas. Provision and regard to the needs of all these groups, (based on age, race and disability, etc) come under the Council’s duties under the Equality Act 2010, (see section 149, the public sector equality duty). The Council’s AAP not only failed to address these issues but may well be discriminatory. The Equality Impact Assessment it carried out was inadequate nonsense and frankly embarrassing.
42. I am also a member of the Parkside Malvern Residents Association and support all their points in their 9-page letter / response to the consultation addressed to Beth Kay dated 30 March 2017.
43. I also support the response to the consultation submitted by the Caxton Road residents.
44. The AAP is fatally flawed because it ignores changing economic realities and changing shopping habits, (such as the growth of online orders), and undervalues localism and the culturally diverse community of Wood Green. Speaking as an Asian woman and a Wood Green resident, I am proud of the area and while I want improvements, I do not want the AAP. Indeed, no-one I know who lives or works in the area thinks it’s a good plan. It appears that only 29 Labour Councillors and Lendlease think it’s a good plan to sell off our assets and betray our heritage and trample all over local democracy.

POLICIES 2 AND 3:

45. **My Comments on Policies 2 and 3: Revitalising the Town Centre and Managing Growth:** See above, where many of those points also apply here.
46. In addition, the urban design structure proposed in the AAP rests on a number of false premises including the fact that partners to develop the sites and provide the housing will be forthcoming, when none currently exist and this is just a hope or a vision, not a reality.
47. Further, you only have to read the wording of these policies, (as set out in the interactive website) for example, to realise the headings and brief descriptions are so vague that meaningful consultation is difficult, if not impossible. Broad statements of intention can be misleading and I believe that this has been done intentionally.
48. Further the 174 page booklet which I found very difficult to get a copy of, (eventually I was only given a copy by Public Voice after a number of inquiries about how to get hold of it), is very dense and inaccessible, not written in plain English, is difficult to understand and wholly unsuited if effective consultation is to take place, particularly with a largely working class local population, many of whom may not have English as their first language.
49. I object to the AAP because it is unnecessary and destructive of existing local communities and businesses. The additional housing and business units that are going to be built in the Heartlands area will lead to an organic revitalising of the Town Centre in the coming years.
50. Further, the whole notion of an expanding upmarket retail offer is based on inaccurate data. Shopping patterns in Wood Green reflect local spending power.
51. The recently published survey by the **Resolution Foundation** says **that incomes are going to fall, particularly median incomes**. This particularly affects areas like Haringey which have areas of social deprivation as well as richer areas such as Crouch End and Muswell Hill. The areas affected by the Tottenham and Wood Green AAPs are the poorer areas of the borough and although many people welcome regeneration as a general concept, they do not want the level of change envisaged in Option 4 and the AAP.
52. **The AAP's vision for the enlarged Town Centre.** Many of the assumptions that these proposals are based on are inherently flawed. I am unclear what the Haringey proposals are based on in terms of a "retail survey", but knowing Haringey it could even be out of date or missing.
53. Many retail studies ask people if they want more or better shops and the answer is always yes. Where people shop is complex but it is always underpinned by their

spending power. **Lots of retail regeneration fails because it draws retail spending away from another area. Many people visit Wood Green because of its eclectic mix of cheaper shops.** These shops are clearly not going to sit alongside big High Street brands and will end up being moved out of the shopping centre. Haringey Council fails to understand that the local people will not start shopping at these big brands: they will go to Edmonton or elsewhere. (That's without the whole point I made previously about the growing trends in online shopping.)

54. What keeps Wood Green going is precisely its vibrant mix of different retail offers and the AAP will drive away small market stall holder, small individual shops and independent retailers. Small businesses will be priced out of the area. Therefore I object to the AAP's so called transformation of the town centre along with the flawed and dubious methodology on which it is based.

POLICY 4:

55. **My Comment on Policy 4: Wood Green North.** I do not agree that there is a need for the amount of housing proposed, see above. I have set out my proposals for alternative policies in the previous sections.
56. **Haringey Civic Centre:** at present, the AAP proposes that a brand new building will house the Civic Centre, Library and council offices in Coburg Road. I object to this and regard such a new building as unnecessary, unreasonable, disproportionate and a reckless use of public funds. As noted above, I propose instead that the current Civic Centre is enlarged, developed and refurbished so as to provide space for a fully functioning Civic Centre and Council building for council officers and councillors.
57. **Green Ridings House:** This is an outdated telephone exchange and I do not object to the redevelopment of this site to provide residential property and / or mixed use, subject to any compelling objections by nearby residents. I note that the AAP says that this site may be contaminated and a piling statement will be required and also that it lies in a groundwater Source Protection Zone and any development should show how it improves local water quality, points with which I agree.
58. **Wood Green Bus Garage:** I agree with the proposed development of **Wood Green bus garage** as long as noise from the bus garage can be dealt with so as not to adversely affect housing built above it, and as long as there are no loss of existing jobs. I note the comments about potential contamination and a piling report, flood risk assessment and so on.
59. **Station Road office:** I object to this policy and I am unclear why the AAP proposes new Council offices in an expensive new building in Coburg Road, (i.e. less central

than currently), but wants to sell off Station Road. Either the Council needs the Station Road office space or it does not. If such Council office space is needed, do not sell it and do not relocate to a flash new expensive building elsewhere in the borough. If the Council do not need Station Road and the Council offices can be housed in the existing Civic Centre, only then consider selling Station Road

60. **Alternatively**, if the Council goes ahead with its plan to sell the Civic Centre to Lendlease as part of the HDV, then it should retain its Station Road building to house council officers and councillors and meetings rooms and refurbish Station Rd to act as a Civic Centre and council offices. **Station Road is in an ideal central location opposite Wood Green tube station to house a new Civic Centre and council offices.**
61. **Vue Cinema or Mecca Bingo sites:** I have no objection to the AAP in respect of the Vue Cinema or Mecca Bingo sites.
62. **Morrison's Wood Green:** I object to this as I think the plan for Morrison's is poorly thought out and it is linked to the proposal for a new Town Square to which I object. Given the level of new development noted above, it is unrealistic to imagine that yet more can be done on the Morrisons site without substantial impact on local communities, to their detriment.
63. I note that the AAP envisages getting rid of a lot of car parking "due to the excellent local public transport connections", but this ignores the needs of disabled people and the elderly who often need to be able to drive and park in order to shop and who cannot, (for a variety of reasons), use public transport. **It appears the Council have once again ignored marginalised groups and groups protected under the Equality Act 2010. I note that there are no provisions for the needs of disabled people in the AAP.**

POLICY 5:

64. **Policy 5: Wood Green Central.** I object to all the proposals in relation to policy 5.
65. **Wood Green Library.** I object in the strongest terms to the policy of transferring Wood Green Central to Lendlease as part of the HDV. It is a local focal point and a well-used resource and aids community and social cohesion. The policy is based on the false premise that Crossrail 2 is coming to Wood Green and yet no-one knows whether that is the case.
66. **Wood Green Town Centre West and The Mall East:** I object to this for reasons given above and below.

- 67. THE MALL AND SKY CITY:** Many Market Hall traders object to their landlord's proposals which will see them be decanted to the fifth floor of the Mall car park between June and November 2017 because when they return they will have smaller units / floor space and their rents will increase, although their landlord, (Capital and Regional), will not tell them what the rents will be. A number of the Market Hall traders told me that as they are moving from larger spaces into smaller spaces on the 5th floor of the car park, they will not be compensated for this loss of stock and revenue and for the costs of putting shelving and other parts of the units into storage or having to discard them altogether. The Market Hall traders are paying a heavy price for losing their position on the ground floor of the Mall, (where there is plenty of footfall or people passing) through loss of income, capital losses and an uncertain future. Yet it is a vibrant mixed community with lots of local traders who many of the local community rely upon to provide, fish, meat, vegetables, clothes, food, etc etc. Haringey is destroying our existing communities for a grandiose scheme that local people do not support. Some Market Hall traders told me that they have heard about the AAP but they don't understand why the changes are being made now only for more change to happen a few years down the line.

The proposed demolition of existing social housing: A Key Issue:

- 68.** I object to the AAP because the "new plazas, public spaces, and connecting routes" proposed are unnecessary, unreasonable and disproportionate. This plan proposes the demolition of the Mall, the homes of tenants in "Sky City" (the homes above the Mall which are owned by Metropolitan Housing Trust), and demolition of Bury Road Car Park and "Page High", (the homes above Bury Rd Car Park, owned by Sanctuary Housing Trust), the demolition of the Community Hub, (previously known as the Asian Centre), and privately owned houses in Caxton Road, Mayes Road, Coburg Road, and so on.
- 69.** The provision of high density new homes, with smaller unit size does not meet the need of local people, many of whom have larger families and need larger, not smaller, units.
- 70.** Further, the Council has legal obligations towards those who are currently housed in public housing such as in Sky City and Page High. These residents are tenants who have been housed due to social need: they tend to be disproportionately vulnerable and from BME backgrounds and some are former refugees. The AAP sees them displaced for years to anywhere in the country and then no guarantee of being offered homes back in Haringey at "social rents". There is no guarantee of housing them in Haringey and certainly not at the social rents they currently pay.

The difference between "affordable rents" and "social rent":

71. The Council has said that they **hope** that 40% of the new housing they propose will be let at “affordable rents”. However, there is no guarantee of this as the Council has no partners who have offered to build the thousands of new homes they propose to build.
72. **“Affordable rent”** is a higher rent than would normally be charged for social housing. The landlord can charge up to 80% of what it would cost if you were renting the property privately. In contrast, **“social rent”** refers to social housing let at low rents to those who are most in need. Usually, councils and not-for-profit organisations (such as housing associations) are the ones to provide social housing at social rents.
73. **“Affordable rents” are 80% of the market value**, that is, not the market value of the homes now but the market value of the new homes in the future when of course prices will go up. Because of the demographic of those who live in the Tottenham AAP and Wood Green AAP areas, these groups cannot afford “affordable rents”.
74. **In contrast, “social rents” are rents that are lower than affordable rents and are what were or are council and housing association rents: they are lower than 80% of the market value, that is lower than affordable rents.**
75. **Due to the benefit cuts and the increase of London market values and the low wages of many Haringey residents, many cannot afford “affordable rents” – they can only afford to pay “social rents”.**
76. Catherine West, Labour MP, said today, (28 April 2017), that she wants the Council to guarantee that they make 50% of the new homes affordable rents. This will **not** assist the people who live in Sky City and Page High because at the moment these tenants pay **“social rents”**.
77. **The poorest and most vulnerable sections of our community can only afford homes with a social rent. Therefore I oppose the HDV and the AAP in its entirety and I urge all those who read this to oppose it also.**
78. Further, the AAP statement *“Existing planning policies will be used to ensure that an appropriate proportion of new homes are affordable, and that affordable stock levels are increased through new development”* ignores the fact that ‘affordable’ bears no relation to the housing cost before displacement and that the council / landlord may consider its legal responsibility discharged without offering displaced residents equivalent housing in the nearby new developments. The AAP places the threatened community in an invidious position, facing rehousing from a condemned Sky City they call home to a place and at a time that no one can predict, all in the knowledge that failure to accept what is offered may discharge the council / the landlord, as author of their misery, of all responsibility. This is an unacceptable and avoidable consequence of the AAP’s unsubstantiated proposal to redevelop The Mall/Sky City. **The AAP must be revised to bring forward proposals for an**

integrated approach to refurbish, modernise The Mall and Sky City in a way that enables its residents and local small businesses to be part of its future as a successful and sustainable community.

79. If these tenants are turfed out of their homes under the AAP, we will have turned our backs on the most vulnerable and disadvantaged sections of our communities – and it is a disgrace that it is a Labour Council who are proposing this.
80. I note that my Labour MP, Catherine West, has not spoken out against the AAP. In contrast, she has openly stated that she supports the residents of Caxton Road, Mayes Road and Coburg Road, (who mostly own their lovely Victorian homes), and that their homes should not be demolished. I agree with that position.
81. However, I am more concerned about the economically disadvantaged and the vulnerable in our community such as those who don't own their own homes, whose voices are less likely to be heard and who under this plan will be turfed out of their social rent homes.
82. The AAP fails to identify the case for redevelopment over the benefits of delivering a major refurbishment/ modernisation and extension in half the time without destroying the area's growing retail and economic success. Existing housing could be refurbished earlier and opportunities to create new homes and open space taken forward: there are excellent opportunities to do this whilst integrating Sky City into the townscape and resolving issues around access, orientation and fear of crime.
83. The AAP should prioritise building on existing success and supporting existing communities, not trusting in something that will see a period of reverse growth, uncertainty, disruption and risk. This aspect of the AAP is undeliverable when this proposal is wholly dependent on factors that council planning cannot control, including the delivery of Crossrail, retailers remaining or returning to the town centre following the period of uncertainty, decline and redevelopment, and the growth of competitors such as Westfield-Stratford, Brent Cross and the West End, all of which will become little for than 30 minutes away (not far when town centres must also offer more than just convenience).
84. **No evaluation of the risks and disruption involved from compete redevelopment is made nor consideration given to the impact of a period of uncertainty and decline from which there is no guarantee the town centre will recover. The negative impact and costs include loss of retail employment and associated economic benefits for the area, loss of homes that could be refurbished at far less cost, the social and health costs of reprovision and loss of community.**
85. The AAP contains no credible proposal to provide alternative housing to residents whose homes are proposed for demolition: in a consultation meeting with Parkside and Malvern Residents Association on 28th March 2017, Council officers stated

existing housing policies would be used in conjunction with future planning permissions that are to be negotiated on a site by site basis. Thus, the re-provision of homes lies well outside the AAP and beyond the control of planning officers to deliver, in terms of number and timescales.

86. I object to the AAP because the plan to build 7,000 new homes is clearly not sustainable in terms of the Council's duties under the London Plan to create viable communities and ensure there are **green spaces and a proper transport infrastructure** and meet the **statutory obligations** to those on the housing waiting list, those who are overcrowded and those who are homeless.
87. Further, London and parts of Haringey are already in breach of EU regulations on **air quality** and pollution levels will become intolerable leading to the deaths of thousands more people and increasing levels of asthma amongst our children and older people. The High Court has just ordered the Conservative Government to publish its plans to tackle illegal levels of air pollution in May 2017, and Haringey has no policy to deal with air pollution in its AAP.
88. The AAP does not provide more green spaces but see more of it disappear, such as the Hornsey filter beds, see also below.
89. **As an alternative I propose adopting a policy** that will design small-scale sustainable regeneration that sees the Sky City and Page High homes improved and refurbished and some new homes built in smaller densities and in specific areas without demolishing the homes of either existing tenants or homeowners.
90. **Iceland site:** I do not object completely to the proposal for this site, but I propose that any housing built must be 50% **social housing at social rents**, (not affordable housing).

POLICY 6:

91. **Bury Road Car Park and Page High (Sanctuary Housing Association) homes:** I object to the AAP on this for the reasons given above in relation to the development of The Mall and Sky City.
92. **16-54 Wood Green High Road, Land between Westbury and Whymark Avenues and the Turnpike Lane Triangle:** I think too little thought has gone into these proposals and they are described in such general terms that I am unable to comment in any meaningful way. The needs of the local communities should be paramount.

POLICY 7:

- 93. Coburg Road North, Bittern Place, Clarendon Road:** I object to these proposals for the reasons given above and below. There is no need for an expensive new Civic Centre in Coburg Road.
- 94. Policy to have links to the west and Alexandra Palace:** I object to the reconfiguration of the town centre and excessively high densities being put forward on the basis of a new connection being made to Alexandra Palace: the AAP contains no such connection nor the means to deliver one. The AAP is wrong to suggest there is or could ever be connection here with Alexandra Palace: no such connection has ever featured in the plans for Alexandra Palace and Park, it would be harmful to the nature reserve and would be extremely expensive and unfunded. The suggestion in the AAP is simply a fiction used to justify excessive built density and under provision of new open space. At best, the Penstock Path could be given a new limb to link to Newlands Field, a remote area $\frac{3}{4}$ of a mile from the elevated Alexandra Palace, unlit and accessible only across fields without pathway or public transport. The AAP should also be less obsessed by the importance of a single link to the west of the borough via a boulevard and Coburg Road when there are four existing connections whose successful integration with the town centre are more important to successful growth and sustainability of Wood Green, namely, 1) Hornsey Railway Bridge between New River Village/Hornsey High Street and Turnpike Lane/ Clarendon Road South/Heartlands, 2) Penstock Path to New River Village/New River Path northwards/Newlands Field towards Alexandra Park and Muswell Hill, 3) New River at Wood Green Common and 4) the footbridge at Alexandra Palace railway station, which should be established for pedestrian and cyclists.
- 95. Wood Green Cultural Quarter (South and North):** I object to the policy because it imposes top-down redevelopment and you can see from comments already posted on the interactive website that local people and small businesses want to be involved in developing the area in a sustainable way. I suggest as an alternative a neighbourhood forum should be established under the Localism Act as noted above and a new sustainable plan developed. The AAP will see local groups, artists, and other groups unable to afford to continue in the area.
- 96. Western Road Car Park:** I do not object to the development of this site, subject to proper local consultation.
- 97. Hornsey filter beds:** Apart from the fact that I object to a lot of what the Council has written as it in gobbledegook and not in plain English, I object to the development of the Hornsey Filter Beds because these are a natural resource, wildlife habitat and should be developed for leisure and social use in order to enhance the quality of life of local residents. A local plan drawn up with the help of groups like Friends of the Earth and the local community should be developed and acted upon.

THE HDV: THE ELEPHANT IN THE ROOM AND CONCLUSIONS:

98. In conclusion, I believe that most of the AAP is an impractical, risky, grandiose scheme that does not deliver value for money and that it has a hidden (or not so hidden) agenda.
99. I believe that the AAP is, at least in part, about increasing land value and allowing the Council to pursue its ambitions to push through its policy on the HDV and its proposed agreements with Lendlease.
100. None of the Council's responses in March 2017 to the call-ins and concerns raised in the Overview and Scrutiny Report (January 2017) really deal with the issues raised and, as a former Equalities Advisor, I believe that their response on the **Equality Act 2010** points are nonsense. The responses of the Haringey Cabinet are superficial, dismissive and do not actually answer the points raised at all, because they do not say HOW they "will ensure that relevant mitigations are put in place", to give just one example.
101. Lendlease is a terrible partner and yet the Council has chosen it as its preferred partner for the HDV and has decided to transfer £2 BN of our assets to a LLP, and has done so by giving up its power when it could easily have insisted on holding a **55% share** of the newly created LLP.
102. I have rarely seen such an ill-thought out plan that so thoroughly ignores the needs of a local community, many of whom are vulnerable and disadvantaged.
103. The 29 Labour Councillors who pushed through these plans without giving us adequate time to read, digest and comment are not concerned with really consulting us and obtaining our views, nor are they really interested in representing those who voted for them.
104. Had I had more time, like many others, I would have written far more detailed objections.
105. **I for one, along with many others, will continue to oppose the HDV, the Tottenham AAP and the Wood Green AAP because it does not serve the needs, interests, aspirations and concerns of the many local communities that make up our somewhat run-down, but vibrant and diverse community. We deserve so much more.**

Natasha Sivanandan, local resident, 28 April 2017.

ADDENDUM SUBMITTED BY Natasha Sivanandan:

- 106.** Public Voice, an organisation that has been collecting some of the responses to the Regulation 18 consultation on the Wood Green AAP on behalf of Haringey Council, informed me on 28 April 2017 that if I submitted comments over the bank holiday weekend, they would still be considered as part of the consultation process. They noted that no-one would be reading any of the responses before Tuesday 2 May 2017 due to the Bank Holiday weekend: which shows how idiotic the Council were in not making the deadline fairer to local people and groups by extending it to say midday on Tuesday 2 May 2017.
- 107.** I submitted my 17 page response, (above), by email to Haringey before midnight on Friday 28 April, with the intention of adding other key points over the bank holiday. I suffer from repetitive strain injury so typing the above response was very painful and I thank Public Voice for clarifying the point as I could not get hold of anyone in the Council Planning Department to ask them about the deadline.
- 108. THE PLAN TO DEVELOP THE TOWN CENTRE:** At paragraphs **52 to 54 and 62 to 63 above**, I have highlighted some of my objections to the AAP, but omitted to mention one key point that renders it completely misleading, inappropriate, unreasonable and unrealistic. The AAP repeatedly makes the point that the Council **will get rid of** most of the current car parking areas at Morrisons, The Mall and Bury Road on the grounds that public transport links will be excellent so people can arrive by public transport at the new town centre once Crossrail 2 arrives, (if it ever does). **The AAP ignores the fact that large retail complexes like Brent Cross and Westfield succeed because they have massive car parking available and great road / transport access without which they could not survive.**
- 109.** Brent Cross has the North Circular (A406) and Westfield has the A12, A107, A104: that is, access by dual carriageways or more traffic lanes. **Even the nearby shopping Centre in Enfield Town has better road access and better car parking facilities.**
- 110.** Wood Green has no such road access and anyway the AAP proposes the disappearance of car parking facilities, not its enlargement. Retailers will simply **not** come to Wood Green without road access for drivers and more car parking space. **This is borne out by real, recent evidence:** when Morrisons Supermarket started charging for car parking, shoppers stopped going, so Morrisons abandoned this policy and went back to free parking, (for the first 2 hours at least).

111. **The inadequacy and inaccuracy of the retail and town centre report:** Haringey Council commissioned a retail and town centre study in 2013, see the 58-page report by Nathaniel Lichfield and Partners. It is entitled “**Wood Green Town Centre Regeneration Retail Capacity Assessment**”. The Report was updated in February 2016, to take into account some retail figures and projections produced in 2015, **before the Brexit vote in June 2016. Given that the report ignores the likely impact of the most important economic development in 40 years, the report is wholly inadequate.**
112. The study looked at projections based on 2013 and 2014 figures with some updates from 2015. **The Report is based on outdated figures and projections and completely ignores** the potential downturn and economic uncertainty caused by **Brexit**, which will **not** be felt until at least 2019 / 2020, just at the point these risky schemes under the AAP are likely to begin, if the Council have their way.
113. The Report used estimates about population and spending power and shopping habits that do not reflect the most recent projections from, (for example), the projections about income and spending power in the April 2017 Resolution Foundation report, (to which I return in a moment). **The retail and town centre report also completely fails to mention (let alone consider) anything about transport links, car parking, access for the disabled or sustainability.** (If you don't believe me, do a word search on the 58-page report.)
114. Interestingly, the Report does note some positive points about Wood Green as it currently exists. For example, at point 2.10 where it states, *“These figures suggest that during and since the recession, Wood Green has performed better than other centres across the country in terms of shop vacancies, although the number of vacant units has increased since 2012”*
115. The report notes the growing number of charity shops but, at point 2.20, it notes, *“In many cases charity shops can afford higher rents than small independent occupiers because of business rate discounts, therefore it does not follow that these charity shops will be replaced by traditional shops when the [economic] market recovers, particularly in secondary frontages.”*
116. Tellingly, the Report notes at point 2.24, *“In general operator demand for space has decreased during the recession and, of those national multiples looking for space, many prefer to locate in larger centres, (West End, Brent Cross, Westfield and Lakeside).”*
117. The Report states, at point 3.44, *“Despite the reduction in comparison shops since 2012, Wood Green Centre still has a good variety of outlets (154). This retail offer reflects the centre’s role in serving a wide catchment area. The wide choice and range of comparison retailers is consistent with the London Plan’s designation as a Metropolitan Centre.*

118. At point 4.8 the Report notes, *“The 2013 study identified and assessed potential sites that could accommodate additional retail development in the Borough, but the study identified few potential retail development opportunities, primarily due to residential areas surrounding centres. The key potential retail development opportunities identified were in Crouch End and Wood Green. No development opportunities were identified in Green Lanes or Muswell Hill.”*
119. And it states at point 4.9, *“The AAP for Wood Green will need to explore in more detail the potential to intensify retail and town centre uses.”*

BREXIT, THE CHANGING ECONOMIC CLIMATE and IMPACT ON HDV AND AAP:

120. **BREXIT, THE CHANGING ECONOMIC CLIMATE and ITS IMPACT ON THE HDV AND AAP:** The most authoritative recent figures which I could find **since the Brexit vote**, that appear to accurately predict future income and therefore spending power, came from the **February 2017 Resolution Foundation Report entitled “Living Standards 2017”**. The report is based on proper research and from reliable figures, including from the Office for Budget Responsibility, (OBR).
121. The Resolution Foundation Report notes that the current “mini-boom” is drawing to a close and at page 9 of its Report, states that: *“This overall weak growth also hides a division between growth for some and falling living standards for others, as Figure 3 shows. Very significant cuts to working-age welfare of over £12 billion are a key component of what looks set to be falling living standards for almost the entire bottom half of the working-age income distribution between this year and 2020-21. Chief among these welfare cuts are the remaining three years of a freeze in working-age benefits in the face of greater than previously expected price increases; the implementation of reductions to work allowances in Universal Credit to make the new system significantly less generous than existing benefits; and other cuts that impact on families with more than two children in particular.”*
122. At page 10 of the Resolution Foundation Report, it notes that, **“Bottom-half incomes are set to fall significantly, Median income set to stagnate, Top-half incomes set to grow slightly.”** The findings of the report are particularly relevant for Haringey where we have a large number of people on benefits and low incomes.
123. The projections in this Report have a direct impact on the HDV and the AAP and the plans to regenerate the area and make the Council’s preferred option 4 appear even more ill-conceived and risky than previously thought.
124. **In addition, on 28 April 2017, the Planning Inspectorate produced a Report on Haringey Council’s plans.** I did not have time to read it and study what implications this has for this consultation process but (on a brief look), it appears that the Report may have noted some contradictions in some of Haringey’s proposals.

- 125. I think the date of this Planning Report underscores and supports my point made at the start of this response about lack of meaningful and effective consultation.** Meaningful and effective consultation involves not just adequate time to absorb, understand and respond to the AAP documents, (which are either deliberately or recklessly inaccessible and vague), but also time to read and understand the data and reports on which Haringey Council is basing the plans.
- 126. The Council's failure to consider the impact of Brexit and the economic uncertainty that will follow 2019 – 2020, when the UK leaves the EU, (including the possible departure of a large number of European workers and families from Haringey), is a negligent oversight on its part and undermines its plans.**
- 127.** As a matter of common sense, if the underlying information is wrong, inaccurate or out of date – as I state here – then it undermines the credibility of the AAP and the Council's "preferred option 4" and its plans for the HDV, which I think is why the Council wants to rush through the approval process as soon as possible. The new economic reality will probably be unlikely to be felt for another 3 years and that's why the Council, I believe, is intent on pushing ahead with its plans in July 2017, without any delays. This is reckless and risky and contrary to principles of good governance.
- 128. Like many local people, my starting point is that regeneration is welcome but only when the needs of local people and communities are taken into account and when carried out in a sustainable way that ensures that the Council meets its legal duties, (whether on equality, access, air pollution or viability or good financial and corporate governance, etc.)**
- 129.** The Council and 29 Labour Councillors have shown a deep contempt for the people of Haringey, particularly those affected by these plans who, (and this is not a coincidence), happen to include the poorest and most disadvantaged sections of our communities. No doubt the 29 Labour Councillors who voted for and are pushing forward with the HDV and the Tottenham and Wood Green AAPs are banking on the fact that **they will be approving the HDV and AAPs in July 2017, but the Councillors are not up for re-election until 2018.**
- 130.** I hope that **all** the consultation responses will be read by **all** the Labour Councillors and the relevant Council officers. Along with previous objections, including from the Labour and Lib Dem call-ins, I hope my response assists in identifying just a few of the reasons why the HDV and the AAP should be scrapped. **The people of Haringey need and deserve to have our voices heard: we deserve better from our Council and our elected Labour Party representatives.**

Natasha Sivanandan, local resident.