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Planning Policy  
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London Borough of Haringey  
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Dear Sirs ,

**Review of London Borough of Haringey's Draft Core Strategy, Draft Site Allocations DPD and Draft Development Management Plan Document**

I write to submit my comments and proposed amendments regarding parts of the above documentation and do so in support and addition to those raised by fellow residents.

I would ask that this covering letter be submitted to the Planning Inspector as part of the record and preamble to my comments.

There are the following general comments regarding the three draft documents, Draft Core Strategy (CS), Draft Site Allocations DPD (SA DPD) and Draft Development Management Plan Document (DPD), as well as the consultation and supporting research leading to this consultation :-

1. As a resident and someone who is a member of the Noel Park North Area Residents Association, Friends of Russell Park and Noel Park Conservation Area Advisory Committee, the first I heard of the consultation was through the Haringey Federation of Residents Association. For some reason while mention of engagement with groups such as ours was made in the Statement of Community Involvement, no attempt to do so was ever made which resulted in a similar lack of engagement voiced by Chris Mason. I question whether the requirements of the Statement of Community Involvement have been properly met.
2. I am inclined to agree with the comments made by Chris Mason in his covering letter regarding how the Core Strategy does not appear to fulfil its purpose in accordance with PPS 12 as well as the weaknesses in the proposed strategy given the changes in the economic and social landscape since 2008. As a resident I struggle to accept that the creation of more town centres without protecting and regenerating local businesses on the ground will regenerate our communities. Instead, the decline of our local high streets is evidence to the contrary. The language of the Core Strategy is also vague and unsuitable for what should be a clear policy document.
3. Given the lack of engagement with residents in the borough and the staggering amount of documentation that has to be consulted upon and reviewed, I support the call by Colin Marr for the consultation to be scrapped and documentation to be reworked so that it clearly reflects not only the vision of the Council but that of its residents.

4. There are shortcomings to the Sustainability Appraisals referred to.
- a) Have they included studies showing the impact of economic deprivation on local population's lifespan which is on average 7 years shorter in the eastern side of the borough compared to the west.
  - b) There is a lack of acknowledgement of levels of crime and deprivation in areas of high population density with a shortage of community facilities and services. Can they elaborate on this? As with para 4.d) below, have they considered the possibility that strengthening community cohesion through supporting community groups will reduce the level and likelihood of crime?
  - c) The sustainability appraisals acknowledged that the appraisals were undertaken with only an overview of the relevant plans and programmes which need to be considered in detail.
  - d) In part 5 of the DPD SA, no mention is made of the following :-
    - i) the need to consider population densities and its impact on existing services, economy, crime and communities or how to prevent over-population
    - ii) the requirement to engage community groups and improve / strengthen community groups thereby encouraging self-sufficiency and true sustainability. This is also one of the key principles of the Aarhus Convention and Sustainable Communities Act 2007.
    - iii) What can be done to improve the life expectancy of the population in the east of the borough which has high levels of poverty and deprivation.
    - iv) I would have thought there was a need to study the impact of town centres and its impact on the local economy, have local businesses benefited from the creation of town centres? No mention is made of this.
    - v) Promotion of cultural activities mentioned in the SA is not equivalent to improving support and engagement with community groups which in turn form the backbone of community cohesion. No mention is made of improving support and engagement with community groups.

Please find enclosed my comments on the Draft Core Strategy and Draft Site Allocations DPD. Please note I have not commented on other sections of the Draft Core Strategy or Draft Site Allocations DPD as other resident groups have volunteered to review these and my lack of comment should not be taken as acceptance of the remainder of the provisions as drawn.

Owing to the lack of time I am not able to submit any comments on the Draft Development Management Policies and await indication from the Planning Department as to when this will be extended to.

Meanwhile, I wish to participate in the examination of the documentation and its comments and would be grateful if you could please let me have notification of same.

Yours faithfully,

Mei Wang  
Member, Noel Park North Area Residents Association  
Treasurer, Noel Park Conservation Area Advisory Committee  
Secretary, Friends of Noel Park

HARINGEY COUNCIL DRAFT CORE STRATEGY – MAY 2010  
 Comments on the Council's Proposed Submission from Mei Wang, NPNARA, NPCAAC, Friends of Russell Park

Chapter	Paragraph	Original	Amendment	Soundness, Etc
Entire Document – Draft Core Strategy			I agree with comments / amendments made Chris Mason already submitted. Following comments / amendments should be read in conjunction with his.	
			the language used is vague and incoherent for what is meant to be a document setting out complex planning strategy. Phrases such as "high quality" or "high quality" are littered throughout the Draft Core Strategy without any clear definition or indication of how a development would satisfy the standard. Another example of vagueness can be found in eg. Pg 106 Para 5.3 SP10 Town Centres the last sentence in the second paragraph speaks of "... sustainable (?) access to higher quality goods and services." The word "sustainability" and its variations appear to be used as bywords and I am unable to see how it could apply to access to goods or services	
Chapter 5	Pg 125 SP10 Town Centres	First paragraph "The Council ... town centres and the five District Town Centres."	Insert at the end of the paragraph the words "... with the introduction of planning measures promoting quality mixed uses in traditional arrangements by more subtle exoneration and where heritage assets exist to use heritage-led regeneration as promoted by PPS5."	Fail. It is insufficient to merely cater for redistribution of retail growth when Haringey suffers from a loss of more traditional small businesses and difficulties in small businesses sustaining themselves on the high street.
		Fourth paragraph "... potential impact of noise ..."	Insert after those words "impact of" the words " ... crime, anti-social behaviour, ..."	Fail. Considerations of crime and anti-social behaviour are very relevant and were not included.
		Fifth paragraph beginning "The District Town Centres ..."	Elaborate or identify service centres.	Fail. The words "service centres" have not been defined.

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Chapter	Paragraph	Original	Amendment	Soundness, Etc
	Fifth paragraph the words "... widening their role and offer, developing their identities, ..."	Delete those words and replace with "... encouraging diversification of local businesses, particularly to support development of a local and sustainable economy."	Fail. Again, the language fails for uncertainty.	
	Last paragraph.	In addition with comments from Chris Mason and other residents, I would ask for this to be deleted.	<p>Fail. Haringey's Draft Core Strategy appears to advocate continued development of shopping centres to create new retail space, eg. Wood Green. It is questionable whether Wood Green is the success that Haringey Council claims as there has been a severe loss of traditional business due to :-</p> <ol style="list-style-type: none"> <li>1. Rising cost of commercial rents and rates which follow large developments.</li> <li>2. Limited business opportunities due to encroachment of larger enterprises such as Tesco, Morrisons, Sainsbury, Primark, New Look.</li> <li>3. Limited long term employment opportunities for local residents from businesses such as pound shops and betting offices.</li> <li>4. Other than the library or post office it is unclear what other facilities there are in Wood Green for local communities.</li> <li>5. Rather than new town centres, I support the call for the development and revival of the Tottenham High Road Corridor and encourage small high street developments within neighbourhoods to supply local residents and reduce congestion in town centres.</li> <li>6. As highlighted in the Avenue Gardens Residents Association's comments, the research used in the Council's evidence base is out of date and the numbers based on the Retail Study are no longer suitable for present purposes or current economic times.</li> <li>7. Wood Green is encouraged to reach Zone A retail rents but this discourages local economic growth. The Core Strategy should take into account planning provision for the</li> </ol>	

Chapter

Chapter 6

Paragraph	Original	Amendment	Soundness, Etc
Pg 138 SP11 Design	I agree with comments / amendments made Chris Mason should be read in conjunction with his.		development of local communities and its economy to truly deserve the phrase "enabling local communities to become more sustainable".
Pg 139 SP-11	First paragraph SP11	The word "sustainable" be replaced with "well designed and built with sustainable / renewable materials"  This needs to be reconsidered and redrafted completely. Compare with Chapter 2 of the UDP which sets out clear objectives to be achieved.	Fail. All buildings are sustainable, it is the materials that are used that needs to be specifically targeted as sustainable.  Fail. Again, the statements are incredibly vague and leaves too much room for uncertainty when it comes to interpretation. Given the Core Strategy will determine the borough's planning strategy for the next 15 years, it is not acceptable that no clear direction is given for how the borough will be developed in terms of design.
Pg 147 SP12 Indicators to Monitor Delivery		Additional bullet point :-  • Improve and tighten enforcement of infringements of conservation area regulations.	Fail. Conservation areas in Haringey have been suffering from a lack of enforcement in recent years which have led to deterioration in the character and preservation of the architectural history and quality of the buildings. Improvement and tightening of enforcement in conservation areas is therefore necessary.
	Bullet point :-  • Progress the Conservation Area appraisal programme	Amend to read :-  • Conservation Departments to work closely with Conservation Area Advisory Committees to progress the appraisal programme.	Fail. The objective does not encourage or promote cooperation / consultation between the conservation department and the local CAACs. Rejection of the last conservation area appraisal done by the Council for the Crouch End Conservation Area is evidence that closer cooperation / consultation is necessary to promote a successful outcome. Furthermore, local conservation groups provide a crucial check and balance to the Council's conservation department to ensure they do not lose sight of the conservation aspect of planning in favour of progress.

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**HARINGEY COUNCIL SITE ALLOCATIONS DPD – MAY 2010**  
**Comments on the Council's Proposed Submission from Mei Wang, NPNARA, NPCAAC, Friends of Russell Park**

<b>Chapter</b>	<b>Paragraph</b>	<b>Original</b>	<b>Amendment</b>	<b>Soundness</b>
Sites Suitable for Mixed Use Development	Pg 15 Lymington Avenue, N22 Options	Mixed use including retail, residential and community	Delete "including" and replace with "comprising". For avoidance of doubt insert "A1" after "retail".	Fail. The phraseology leaves it wide open for developers to make applications for too wide a variety of use. The location is very close to a residential estate and restrictions needs to be put in place to ensure the commercial use will not impact on the community around it.
	Pg 15 Lymington Avenue, N22 Relevant Core Strategy Policies	SP1, SP2, SP4, SP5, SP6, SP7, SP8, SP9, SP10, SP11, SP14, SP15, SP16	Insert SP12	Fail. Bearing in mind the property is right next to a conservation area, any development will have a considerable impact on the estate.
	Pg 15 Lymington Avenue, N22 Other Relevant Information	Within Wood Green Metropolitan Centre Adopted Planning Brief (September 2003)	Insert "Adjoining the Noel Park Conservation Area"	Fail. As above, any development will need to take into consideration its impact on the conservation area.
	Pg 32 Civic Centre Options	Mixed use	Insert relevant use classes for consideration. Propose A1, A2, A3, B1, B2, C3, D1 and D2.	Fail. The phraseology leaves it wide open for developers to make applications for too wide a variety of use.
	Pg 32 Civic Centre Relevant Core Strategy Policies	SP1, SP2, SP4, SP5, SP6, SP7, SP8, SP9, SP11, SP13, SP14, SP15, SP16	Insert SP12	Fail. The property is within a conservation area and adjacent to two listed buildings. Therefore, SP12 should be a key policy consideration in any redevelopment plans.
Sites Suitable	Pg 52	Office retail or	Insert relevant use classes	Fail. The phraseology leaves it wide open for developers to make

Chapter	Paragraph	Original	Amendment	Soundness
for Community / Commercial / Employment Development	333 High Road, N22 Options	community use	for consideration. Propose A1, A2, A3, B1, B2, D1 and D2	applications for too wide a variety of use.

Chapter	Paragraph	Original	Amendment	Soundness
	Pg 55 Cranwood Home for the Elderly Options	Education	Object to inclusion of the Home in the Sites Allocation DPD	Fail. Care homes for the elderly are becoming an increasingly scarce resource and alternative sites are available such as the Site at junction of Watsons Rd and Ringslade Rd N22 on page 61 of the Sites Allocation DPD
Sites Suitable for Commercial Development			New proposed site - commercial units at Turnpike Lane as shown on plan attached and edged red.	Turnpike Lane is a strategic underground station and the shops around it could be developed to improve safety for residents as well as improve the local businesses around it.



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