

From Lynne Zilkha

27th March 2015

1. The Consultation.

There are a number of documents and supporting documents which make up this consultation, and the consultation period is only 8 weeks. Haringey's stated aim is to put local people's concerns at the heart of planning, but the consultation documents and plan alterations and the evidence which support them are hard to follow. The form and content of the consultation appears to be geared more towards the developer and others who it is hoped will invest in Haringey and its infrastructure, rather than to the local community and its people.

2. Proposed Alterations to Haringey's Adopted Strategic Policies – Partial Review and "preferred option" Development Management Plan.

It is understood that this is a partial review, and for that reason comments on the existing policy will not be accepted. But the proposed changes are extremely important and far reaching, anticipating a vast increase in population, housing and other infrastructure. It may be that the changes are great enough to merit a whole-scale review and that to limit responses in this way is to rule out possibly better decisions for the future of the borough.

Crucially the review aims to provide for a substantial number of new homes and improvement of housing estates even where the Decent Homes programme has already been carried out. Preferred options for planning policies to permit the anticipated need have been set out.

I am concerned that the council has proposed a preferred option without properly considering alternatives and with insufficient evidence.

The sort of things which the council has failed properly to look at include:

*A thorough assessment of the number of vacant properties and a programme to bring them back into use;

* Village communities, or similar, for the over 60s in order to offer them a better quality of life and at the same time free up larger houses and other properties that are under occupied. A recent House of Commons report, for example, noted that:

" The 2011 Census collected occupancy ratings for bedrooms for the first time. An occupancy rating shows whether a household is overcrowded or under-occupied. This is based on the number of bedrooms available minus the recommended bedroom standard.

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The ONS analysis revealed:

...out of 23.4 million households in England and Wales in 2011, 1.1 million (4.5%) were overcrowded and overcrowding was most likely to occur in socially rented (8.7%) and privately rented households (8.6%), compared with owner occupied (2.3%). However, most households (16.1 million) were under-occupied and under-occupancy was most likely to occur in owner occupied households (82.7%), compared with privately rented (49.5%) and socially rented households (39.4%)"

It could be that considering and implementing policies to deal with under-occupation, including under occupation of owner-occupied properties, could go a long way to solving the problem of an increasing population, without the need to resort to new high density housing.

Similarly, proper consideration of and evidence to support the impact of providing housing dedicated to students, or single people who commute to central London, or other categories who could be more efficiently housed could remove the need for a massive programme of high density housing.

Neither the documents nor the supporting evidence seems properly to have considered the question whether the provision of affordable but owned housing could increase the problem of overcrowding in the borough – by attracting buyers from other areas, for example, - rather than improve the lot of those who already live here. It may well be that encouraging large developments of marketable homes will exacerbate rather than alleviate the problem of over-population.

In this context it should be noted that **ALL** the options, including the preferred solution, lead to an increase in the problems associated with a high density population. Notably each option would lead to deterioration in air quality. The council cannot approve a plan which has a negative effect on air quality, since this contradicts the London Plan and the UK's legal obligations under European law.

There is not enough information, including environmental information, on the proposed development for the council to form a view other than to reject it. Further work to provide and consult on this information should be done.

In particular, I object to the idea that the construction of tall buildings above 5 levels provides an answer to overpopulation or can function as a tool for regeneration. The danger is that without first attracting employment into the area, new housing will serve either as a base for people working outside the area or an area of accommodation concentrated on those without employment or access to essential amenities. This will not meet the aims of the Local Plan for the area. It is to be hoped that the council will learn

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from the lessons of Broadwater Farm in 1980s and the Tottenham riots of 2011 and concentrate not on retail outlets which offer things which local people cannot afford, but on employment and good quality housing.

Much of the good quality or potential good quality housing already exists and the council should be slow to propose demolition of potentially good quality housing and established communities.

Much of the housing has already been upgraded, through the Decent Homes Programme. The council asserts that this work has not been sufficient, but it is not clear where the evidence for that is. In my view the Decent Homes Programme was successful and it would be a waste of the considerable amounts of public money that have already been spent to propose further expensive works or, worse, demolition of the homes to make way for redevelopment.

To sum up: I object to the proposed alteration 64 (page 26/27 and page 62) which undervalues current housing stock and proposes unacceptable high density housing.

3. Site allocations Development Plan

I am dismayed to see Alexandra Park and Palace (SA55) included here for development.

Alexandra Park and Palace is the borough's most important site of historic importance, recreational value and most important local attraction. It is of importance not just London wide, but is of national significance. The site is a conservation area and both the Park and the Palace are listed by English Heritage as grade II and Historic Gardens.

The site is owned by a charitable trust and, as the council will be aware, no changes should be made to it without public consultation which would go wider than the borough.

Because of its significance, status as a public good, local value and inadequacy of prior consultation the Park and Palace should not be included in the Proposed Site allocation plan.

Instead, the preservation of the Park and Palace and its surroundings should be enshrined and preserved in the objectives of the Local Plan.

The fact that the plan proposes a 25 storey block adjacent to the park at the foot of the Penstock Tunnel, at the same time that the report also suggests the important views of and from the park must be preserved and exploited suggests that has been a failure in "joined up thinking". I urge the council to preserve the palace and park and their setting.

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My core objection to the plan alteration is that it seeks to demolish and remove existing good housing and replace it with high density houses which look worse, create rather than solve problems and devalues the stock which we already have.

A prime example of this approach is contained in the Site Allocation Development Plan. The Summersby Road Estate (SA46) which sits next to an environmentally and ecologically important site has been included despite the fact that there has been no proper consultation and no evidence to justify its inclusion. This site should be removed from the SA Development Plan. This is also an example of how the environmental impact report is either not sufficient or has been ignored in reaching these proposals.

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