

To Haringey Council

Tottenham Area Action Plan - Response from Councillor Lorna Reith (ward councillor and local resident)

I am writing both as the ward councillor for Tottenham Hale and as a local resident to make a formal representation regarding the Tottenham Area Action Plan.

I have set out my comments and objections to specific parts of the plan below.

Housing

3.9. I am pleased to see that the vision includes “*much needed higher quality council housing*” but it isn’t clear if this means more such housing or just improving the quality of the existing stock. Clearly, despite the improvements obtained through the Decent Homes programme, more investment in the existing stock is needed. However, given the acute shortage of good quality housing for people on low and moderate incomes it is vital that the plan provides for additional social housing.

3.15 - It is not clear what is meant by “affordable”. The current residents of Tottenham Hale need housing that is affordable for their level of income, not just “affordable” by government definition.

e) **Policy AAP1** - I welcome the reference in D to “*reduce carbon emissions and adapt to climate change*” and I welcome proposals regarding decentralised energy grids. It will be important to ensure that this is given due priority in subsequent negotiations and planning conditions. I would therefore propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.

f) **Housing policy AAP3** - para 4.13 - as referred to above the plan needs to deliver better housing for existing residents of Tottenham Hale, including more genuinely affordable homes as well as bigger homes to ease overcrowding.

g) **AAP6** - tall buildings. Para F - “**Ferry Lane**” - should differentiate between those bits of Ferry Lane in DCF and those adjacent to the river/Green Belt. In particular the Hale Wharf site is not suitable for tall buildings. These should be concentrated at the transport hub and in already built up urban areas - not at the boundary of the green belt. This approach is in line with the wording elsewhere in 4.26 - DM6 - building heights should “*respond to existing street hierarchy*” and “*decrease into the quieter hinterland areas*”. “*Where elements that are considerably taller than this consistent height such as at Seven Sisters station in the Apex House site allocation or at Northumberland Park station... they should mark something or somewhere and have a reason for being taller. These by their very nature should be few in number*”.

Although Hale Wharf itself is not Green belt land it provides the border to Green Belt land to the west, north and east (and a bit further to the south as well). So tall buildings here would severely impinge on the sense of openness that the plan says it seeks to preserve.

A further problem with the plan is that it fails to set out how the housing needs of the existing population will be met. The priority appears to be for new developments which will be one and two bedrooms in size and will not meet the needs of families living in over-crowded, poor quality, insecure, private accommodation. While accepting that Tottenham will see new people move into the area I am concerned that existing communities across the ward will not see the benefit of regeneration and may in practice find themselves eased out. One of Tottenham's key strengths is the way in which people from across the globe live together, get on and contribute to the borough and society in general.

Transport

4.29 *"Managing and improving the capacity of the road network"*. The accepted wisdom in relation to road capacity and traffic generation is that increasing capacity merely encourages more traffic. The area around Tottenham Hale has undergone a major roadworks scheme with the removal of the gyratory, the aim of which was to reduce capacity along Broad Lane to discourage through-traffic. This approach should be strengthened. I would suggest changing the text by deleting *"and improving the capacity of"*.

AAP8 and elsewhere - while I am happy with the principle of car-free development this has to be properly managed, with adequate spaces for disabled people and proper, enforced, parking controls in surrounding streets. My experience as a ward councillor is that people move into a 'car-free' development but think that they will be able to find somewhere locally to park. This has caused considerable resentment and problems on the Ferry Lane estate with residents from Hale Village and the Sian housing development within the Ferry Lane estate parking on the estate. I have also had to deal with difficulties arising from inadequate provision of dedicated parking for disabled people.

Green/open space

2.65 I welcome the inclusion of *"New public spaces need to be added and existing spaces significantly improved... opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged"*. This needs to be considerably strengthened. Green open space has already been lost (railway expansion at Tottenham Hale) and more is at risk (proposed housing development along Monument Way), and more is likely to be lost if the level of proposed housing does get built. While accepting that some new open space will be created the plan lacks an overall assessment of the amount of space being lost; so it isn't clear if there will be a net gain or loss. The proposed increases in population require an increase in open green space and the plan should specifically accommodate that.

There are actions that can be taken to protect and enhance the green space that exists and in doing so help preserve local wildlife. Actions it would be good to see included are:

- Ensure that green corridors provide high quality natural habitat.

- Making new developments really green - on their roofs (where not suitable for PV panels), walls and open spaces, with bird- and bat boxes integrated into structures and with appropriate mix of native species.
- Actively conserve species we do have - for example the small colonies of House Sparrows in South and North Tottenham. Sparrows depend on access to roof space, which means they do best in older streets. Building renovation often blocks such access so it is important to ensure it is replaced when renovation occurs.

So in terms of wording, I would suggest amending 2.65 (as set out in the response from Tottenham and Wood Green Friends of the Earth) to read

“Some development will lead to loss of green open space and natural habitat, for example the three-tracking and Crossrail 2 works at Tottenham Hale. New public spaces need to be added and existing spaces significantly improved including access improvements so that each part of Tottenham has a quality network of green and accessible space that supports a diversity of nature. The Council will monitor gains and losses and ensure a net gain. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged including opportunities at Ermine Road and Plevna Crescent”.

4.35 *“delivering new open spaces of a significant scale is not considered”*. I would argue that the proposed growth in population, coupled with existing deficiencies in open space makes the case strongly for considering new (and significant) open spaces. It also possibly contradicts 2.65.

I suggest re-wording 4.35 (in line with the response from Tottenham and Wood Green Friends of the Earth) to say:

“Due to the significant projected increase in housing and employment in Haringey and Tottenham, the Council will seek to establish new open space where opportunities arise, and to create linkages between them for people and wildlife. Tottenham does have a range of excellent open spaces within it, but some are being lost and others are under pressure from growing population. Development contributions have the potential to be collected and spent on adding to, improving and improving access to existing open spaces. Together, these will form a green grid of networked, high quality open spaces”.

Site policies

TH7 The commentary includes the phrase *“subject to the reprovion of the licensed waste capacity at the Ashley Road depot site”* and last bullet point. However, there is no detail given about where this reprovion would be. This needs to be included. This is an important local amenity and it is unreasonable and unrealistic to expect local residents to cross the borough to reach a waste and recycling site.

TH8 There is outline planning permission for a tower at Hale Village of 18 storeys. This should be retained at this height. There is no justification for a building over 18 storeys. The target for the Mayor’s housing zone can be met without going above the existing permission height. There is a real danger that allowing a

significant change in height would undermine confidence in the housing market. People moved into Hale Village, buying quality properties, on the basis of the original planning permission. To change their surroundings significantly within a few years of occupation may well impact on the confidence of other potential buyers.

TH9 Hale Wharf.

Site requirements: I welcome the reassurance about continued access and facilities for the boaters. Similarly I welcome the need for any development “*to have regard to the environmental, ecological interests in the locality, particularly relating to the water environment and habitat of the Lee Valley Regional Park*”. I support the section relating to the garage site and the need for any development to comply with Green Belt objectives.

TH9 Hale Wharf Development guidelines

I support the guideline in relation to the need for a range of unit sizes and types and suitability for family housing. One of the complaints I receive as a councillor is from people who like living at Tottenham Hale but have started a family and need to move to larger accommodation - of which there is a shortage.

5th bullet - I agree that building heights ‘must respond to proximity and openness of the Green Belt’ but would stress that the site is *within* the river corridor and Green Belt, with the river to one side and the Paddock and reservoirs to the other. The sense of openness should be preserved from Ferry Lane northwards, including around the lock. High buildings at this point would create the reverse of openness, turning the environment into an urban canyon, with Hale Village at 12 storeys on one side and new high buildings on the other. The whole essence of this part of Tottenham Hale is that it is flat and open marshland and has been for hundreds of years. It has a palpable sense of openness and is not urban in character. This must be retained. Tall buildings would undermine that uniqueness and would potentially lead to an increase in heights in the surrounding area - changing the character forever.

6th bullet - I support the aim that the development must be responsive to the natural environment. This should include green walls/roofs facing river on both sides, and incorporate bird and bat boxes etc.

TH10 Monument Way and Welbourne Centre site. I am concerned about the loss of open green space from the proposed housing development. The Plan must ensure that the Green Link at least compensates for this in terms of area, and improves on it in terms of habitat quality. The last bullet point of D Guidelines notes that the wall currently provides a noise barrier. This is something that residents of the Chesnuts estate value. If this is removed then the new development needs to provide at least as good an acoustic barrier from traffic noise.

TH11. Fountayne Rd. Although outside Tottenham Hale ward this area includes part of the O’Donovans site. (The other part of their site will be affected by Crossrail 2). The operation of this site is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on Markfield Road - danger, dirt and mud, and an appalling road surface. I receive a lot of

complaints from residents about noise and about the condition of Markfield Rd. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later - when land to relocate them in NE Tottenham industrial estates is still available and affordable.

Please note that I wish to speak at the examination in public. I am a resident of Tottenham Hale and live very close to many of the proposed developments. Lorna Reith, 75 Kessock Close, N17 9PW
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