

ADDENDUM: Response to Sustainability Appraisal, Wood Green Area Action Plan Regulation 18 Consultation 14 Feb – 31 March 2017

Submitted by and on behalf of affected residents

We respond below to the claims made in the Sustainability Appraisal (SA) specifically with regards to the demolition of homes on Caxton Rd and Mayes Rd.

We note at the outset that according to the SA, the AAP ‘aims to ensure that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it’ (p4). The plans with respect to Mayes Rd and Caxton Rd **do not meet the aspirations of the local community**; indeed, as evidenced in the residents’ submission to Haringey Council and accompanying petition, **the local community in fact strongly opposes these plans.**

Response to the Appraisal Findings with respect to Caxton Rd and Mayes Rd

The SA purports to assess two options with respect to Mayes Rd and Caxton Rd: Option 1 (Redeveloping the properties at Mayes and Caxton Rd) and Option 2 (Retaining the properties at Mayes and Caxton Rd). The findings are summarised in Table 7.1 (Summary Appraisal Findings) and Appendix VI (‘detailed’ Appraisal Findings).

The assertions made in these appraisals are problematic in a number of ways. We deal first in general terms with the evidence base, methodology and overall findings, before addressing the specific claims of the appraisal.

In sum, we conclude that the demolition of existing homes on Caxton Rd and Mayes Rd is

- **Not sufficiently justified**
- **Not reasonable**

1. Evidence base and Methodology of the SA

- **No evidence base** is provided to support the claims made in the appraisal. On what evidence, for example, does the SA support its assessment that crime will be reduced under Option 1 than under Option 2? Or that there are 'no notable implications' for biodiversity, noise, air quality etc.?
- The SA states that accurate predictions are 'inherently challenging', that there is a 'limited understanding of the baseline' and that 'in many instances it is not possible to predict significant effects' (p22). The appraisal therefore **cannot claim to be either accurate or reliable**.
- The **methodology of the SA is opaque**. The study identifies criteria to be assessed (the 'sustainability topics') and questions to ask, but not *how those questions were answered* – ie. it identifies *criteria* for assessment but not *methods* of assessment. What information was used to generate responses to the questions / reasonable assumptions?
- The **methodology is flawed**. The SA states that 'in many instances it is not possible to predict likely significant effects ... but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference' (p57). How is it possible to assess the relative merits of a given option without having an understanding of the potential effects?
- The SA purports to offer a 'detailed', 'rigorous' and 'systematic appraisal of and consultation on reasonable alternatives' including the 'redevelopment of existing homes'. The assessment of Options 1 and 2 relating to Caxton Rd and Mayes Rd comprises 4 pages of a 67-page report (pp15-16, pp62-63). The **study cannot be described as rigorous or systematic, nor its findings detailed**. Further, residents have not been explicitly canvassed on the alternatives (Options 1 and 2) as set out in the SA.
- The **information provided in Appendix VI is clearly inadequate**. For 14 out of 21 criteria, the table simply states 'no notable implications'. This is the case even for topics where there are very clearly obvious implications of choosing one option over another, such as for example, waste management, the town centre, townscape, open space, water resources, air quality, energy consumption etc. The methodology suggests that 'where an issue or an effect is not referenced, the implication of that is that there is no point to be made that warrants a mention' (p57). We contend that such issues as townscape and cultural heritage, open space, water resources etc. do 'warrant a mention' in appraising the scheme.

→ *The appraisal thus cannot be considered to be a robust, evidence-based study. The decision to demolish people's homes cannot be made on the basis of such flimsy and inadequate evidence.*

2. Overall findings

Taking the findings at face value (setting aside for a moment the evidential and methodological shortcomings outlined above), the **appraisal does not provide an overwhelming case in support of Option 1.**

Table 7.1 ranks option 1 as preferable in just 5 out of 17 criteria; in 9 criteria options 1 and 2 are considered to be equal; 1 as unknown; and 2 place option 2 higher. The table in Appendix VI does not provide a ranking for 15 out of 21 criteria. This does not constitute a robust case for support for option 1.

There are also **serious and unexplained inconsistencies** between the findings in Table 7.1 (p16) and the table in Appendix VI (pp62-63). We highlight these inconsistencies in the table below. Note that Table 7.1 ranks 17 criteria; Appendix VI ranks 21 criteria.

Topic	What does Table 7.1 say?	What does Appendix VI say?	Comment
Crime	Options 1 and 2 ranked equally	Option 1 ranked higher	Inconsistent
Community Cohesion	Ranks option 2 higher	Inserts a question mark, stating that 'it is not clear which option will have a more or less significant effect'	Inconsistent. In each case where option 2 is ranked higher in the first table, the second table removes that ranking and inserts ? or blank
Town Centres	Ranks option 1 higher	Claims 'no notable implications'	Inaccurate (there clearly are implications); and how was ranking reached if there are 'no implications' one way or the other?
Townscape and Cultural Heritage	Inserts a question mark (<i>ie. unable to rank? Unable to assess?</i>)	Not ranked: segment left blank	No details provided, despite obvious impact on townscape and cultural heritage implied by destruction of

			Victorian houses
Sustainable transport	Ranks option 1 higher	Ranks option 1 higher but states 'no notable implications'	If there are no notable implications, how was the ranking reached? There clearly are implications; why are these not discussed given centrality of Crossrail to the AAP?
Accessibility	Does not appear in Table 7.1	Ranks option 1 higher and provides one sentence 'discussion'	Inconsistent: why in one table and not the other?
Skills and Training	Does not appear in Table 7.1	Not ranked	Inconsistent: appears in one table not the other
Waste Management	Does not appear in Table 7.1	Claims 'no notable implications'	Inconsistent: appears in one table and not the other. Inaccurate and misleading: claim that there are no implications for waste management cannot reasonably be sustained
Noise	Ranks option 2 as preferable; states that 'noise is likely to increase' under option 1	Not ranked; claims 'no notable implications'	Inconsistent. In each case where Table 7.1 ranks option 2 as higher, the Appendix removes this ranking and replaces it with no ranking or a '?' Misleading: as with waste management, above.

→ The shortcomings identified above **raise serious questions about the quality and utility of the appraisal**. The **inconsistencies and other deficiencies** of the study **do not inspire confidence** in the process or in the competence of those assigned to assess and execute it.

→ Particularly concerning is the manner in which **Appendix VI attempts to overturn any positive appraisal of option 2**. In each case where Table 7.1 ranked option 2 as higher, Appendix VI removes that ranking and replaces it with a '?' or a blank.

→ The AAP is a major development plan on a hugely ambitious scale. The residents of Haringey have a **right to expect that appraisals of the impact of such a redevelopment will be carried out thoroughly, professionally and with due care** at all stages. The diligence one would expect given the scale and implications of the AAP is not reflected in this document.

3. Detailed appraisal findings (Appendix VI) (pp62-63)

We take each topic in turn, setting out the claims of the SA and our response.

Crime

SA claim: 'Mixed use schemes (Option 1) ensure that sites are busy throughout the day, therefore reducing crime/fear of crime.'

Response:

- No evidence to support the claim
- Caxton Rd and Mayes Rd in their current use are already busy throughout the day, as they serve as through-routes to Morrisons and the High Rd (in one direction) and to the Cultural Quarter/Heartlands area, back entrance of the Mall, and Station Rd/Alexandra Palace
- An expanded town centre that borders on, but does involve the demolition of the houses on Caxton Rd and Mayes Rd would also be busy throughout the day
- Official crime statistics locate Caxton Rd and Mayes Rd as *between* crime hotspots centred around the tube stations and the Mall. It is possible to infer that an extended retail area and Crossrail station could *increase* criminal activity in the area, given the opportunities offered by crowds of shoppers and commuters. For figures see:
<http://www.ukcrimestats.com/Postcode/n226TB>

Education

SA claim: 'no notable implications'

Response: Displacement of existing residents will remove educators who live in the area

Health

SA claim: 'no notable implications'

Response:

- Displacement of existing residents will remove health care professionals who live in the area
- Uncertainty with regards to the fate of their homes, potentially massive disruption, and the numerous financial, practical, familial and emotional implications of eviction and relocation away from support networks etc. are already causing significant stress to the affected residents. Stress is a well-known contributor to mental health issues. All residents are currently being subjected to high levels of stress

Housing

SA claim: 'The redevelopment of these properties will create a net uplift in the total number of residential units, and habitable rooms within the AAP area'.

Response: We deal with this in detail in our submission document (pp4-5) but to summarise:

- There may be a net uplift in the total number of housing units but these will be primarily 1-2 bed apartments and apartments above shops, not family homes (which the AAP acknowledges are much-needed; and which the Caxton Rd and Mayes Rd properties currently supply)
- Demolishing the properties on Caxton Road and Mayes Rd will impact on the quality and diversity of homes in the area
- No justification is given for why the proposed new housing should specifically be located on Caxton Rd and Mayes Rd (as opposed to anywhere else)

Community cohesion

SA claim: 'There is the potential for the replacement of existing [sic] housing to have an impact on community cohesion locally. The benefits of providing new homes ... could also create improved community cohesion in the future. As such it is not clear which option will have a more or less significant effect'

Response:

- It is clear that the demolition of existing houses on these streets will permanently break up an existing, vibrant local community who have a significant commitment to and investment in the area
- The Mayes Rd/Caxton Rd area already supports a 'mixed and balanced' community. The housing demarcated for destruction is occupied by a mix of private renters, council tenants, and owner-occupiers, and its residents embody the demographic diversity (age, ethnicity, religion, occupation etc.) that gives Wood Green its unique character.
- The SA states that it is not clear what will be the outcome for community cohesion of building new housing (in this case, 1-2 bed apartments above shops)
- Displacing 'stable communities' of long-term residents (those in family homes, owner-occupiers, etc.) will have a negative effect on community

cohesion if they are to be replaced by populations likely to be short-term and transient.

- The SA recognises that ‘regeneration ... may bring some disruption to existing communities, for example where rehousing is needed to allow for re-provision, or where private housing rents become an issue for some residents (p26). This is a euphemistic way of saying that council tenants may not be rehoused in the same area, and that residents may be priced out of new developments. This is a potential outcome of Option 1: existing council tenants, private renters and owner-occupiers will all be displaced; and increased rents/property prices in the new development will limit the ability to achieve the desired ‘mixed and balanced community’ as it will be affordable only to a certain demographic.

Accessibility

SA claim: ‘The redevelopment of these properties will create a key opportunity to improve east-west connectivity which will make jobs and services more widely accessible’

Response:

- On the east-west corridor, please see 1A (pp2-3) of our main submission in which we set out clear alternatives for the creation of an east-west corridor that fulfils AAP objectives without the demolition of homes
- The claim with regards to making jobs and services more widely accessible is not evidenced; reasonable alternative routes have not been assessed

Economic growth

SA claim: ‘Creating new town centre jobs will directly benefit the local economy’

Response:

- There is no evidence that retaining the houses on Mayes Rd and Caxton Rd creates a barrier to job creation
- As outlined in our submission (1C, p4) economic growth (eg. in the form of expanding the retail area) can be achieved without demolishing these homes. There is still a large number of spaces in the area that can be developed for retail and commercial use without the demolition of homes
- A consumer-led model of economic growth (expansion of the retail area) has significant risks. As the SA notes, this is dependent on ‘wider factors such as the national economic outlook and challenges to the high street from new developments such as internet shopping’ (p30). Wood Green High Rd has seen the closure of a significant number of stores and services in recent years (eg. M&S). Over-extension of the retail area in Wood Green Central carries significant risks.
- Neither the AAP nor the SA provide a specific rationale as to why the economic growth objectives can best be achieved by using space on Caxton Rd and the particular portion of Mayes Rd and Coburg Rd as opposed to anywhere else
- In the short term, anxiety about the possible loss of their homes contributes to reduction in spending and local investment on the part of

existing residents (eg. building and renovation projects involving local labour and tradespeople have been put on hold, due to the uncertainty). The Council has put these residents in the position of not being able to invest in their homes.

Economic Inclusion

SA claim: 'Creating mixed-use development promotes flexible working patterns and good physical accessibility to local jobs ... and may help cross subsidise employment uses [sic] that create jobs and opportunities for new businesses to establish [sic]'

Response:

- The phrasing of the SA claim is unclear and does not make sense
- No reason why possible future 'flexible working patterns' should be promoted above the rights of existing residents to remain in their homes
- As above under 'Economic Growth', economic inclusion can be achieved without knocking down the Mayes Rd and Caxton Rd houses
- Again, no satisfactory explanation as to why *specifically* Caxton Rd and a portion of Mayes Rd (as opposed to anywhere else) are required to fulfil those aims

Town Centres

SA claim: 'No notable implications'

Response:

- The SA is muddled and inconsistent on this point. If there are 'no notable implications' why has option 1 been ranked as preferable in this case?
- Given that the demolition of houses on Caxton Rd and Mayes Rd is proposed primarily on the grounds of expanding Wood Green's town centre, why is this not worthy of any discussion here?
- There clearly are 'notable implications' of expanding the town centre in this way, ie. as the Summary (p63) states, 'the potential [for which read actual] effects on the existing residents of the affected properties'
- As in our submission document (p4), we contend that there are many ways in which the commercial area can be expanded without the demolition of these homes

Townscape and Cultural Heritage

SA claim: 'No notable implications'

Response:

- There clearly are 'notable implications' for the townscape and cultural heritage of the area – ie. the destruction of a significant number of original and irreplaceable Victorian buildings from an area dominated by unappealing post-war developments
- On the historical and aesthetic significance of these buildings and how their destruction contradicts the stated aims of the AAP, see our submission pp5-6

- The SA acknowledges that ‘preserving or where possible enhancing buildings and areas of architectural and historic interest’ should be ‘key issues’ (p31) in appraising townscape and cultural heritage criteria; that ‘heritage assets should be recognised as an irreplaceable resource’, (p49) and that ‘[the] scale of the regeneration proposed will need to be carefully managed to ensure that existing assets ... are treated sensitively in all proposals’ (p31). Demolishing a significant number of Victorian houses does not constitute sensitive treatment of heritage assets

Open Space; Water Resources; Soil and Land Quality; Flood Risk; Air Quality; Noise; Energy and Carbon; Waste Management

SA claim: in all these areas, the SA claims that there are ‘no notable implications’.

Response:

- It is self-evident that the construction of an expanded retail area and high density housing developments in the affected area will have significant implications in all of these areas, not least:
- Open Space: the construction of an expanded retail area and housing development will affect the size and quality of the available open space in the affected area, eg. overshadowing and light issues due to increased height of buildings, loss of green spaces including the back gardens of the affected properties
- Noise: while the table in Appendix VI claims there are ‘no notable implications’ for noise, Table 7.1 ranks option 2 as preferable re noise, and indeed explicitly states below that ‘noise is likely to increase’ under option 1.
- Increasing the population density of the area will increase consumption of energy and carbon, consumption of water resources, and production of waste. Increased traffic to the area is likely to impact adversely on air quality.

Sustainable Transport

SA claim: ‘No notable implications’

Response:

- The claim is inconsistent. If there are no notable implications, why has option 1 been ranked as preferable?
- The lack of a discussion on this point is bizarre. If the very raison d’être of the AAP is to attract Crossrail to Wood Green Central (impacting on the affected area under consideration here), why does the issue of ‘sustainable transport’ merit no discussion in the appraisal of impacts here?

4. Sloppiness and inaccuracies in the SA

We note that the SA is **riddled with typographic and other linguistic errors** throughout the document on almost every page.

Taking a few pages at random, a small selection of these errors includes:

P29: 'it's leisure', 'it's distinctiveness', 'whisl't', 'i-independent', 'Corss Rail'

P30: 'centres baseline', 'Com,mon', 'it's predominantly urban ... nature'

P31: 'is likely to be place increasing pressure', 'not clear entirely clear',

'Alexandra Palace and Hornsey Water Works and Filter Beds ... lies'

P32: 'viablke', 'vicic spaces', 'podoium', 'Calreendon [Clarendon] Road'

P55: 'wood green', 'black households approach as homeless', 'haringey', 'aap', 'northumberland', 'wood green wood green', 'west green', 'noel park', 'london'

On the pages dealing with the 'redevelopment of existing homes' on Caxton Rd and Mayes Rd there are numerous errors:

P15: 'nde', 'Victrotian', 'thant', 'The methodology in detail in the index'

P16: 'in-light', 'with regard its impact'

P62: 'ecexisting', 'create jobs and opportunities for new businesses to establish.'

P63: 'to increase own centre floorspace'

This is relevant in that it **speaks of carelessness and lack of professionalism** and gives the impression that the document was produced hastily and without due care. This is not acceptable given the very significant implications of its content. The cumulative effect of numerous small errors leaves a very bad impression and **undermines confidence in the competence of the study.**

5. Failure to provide reasonable justification for specifically selecting Caxton Rd and portion of Mayes Rd and Coburg Rd

We have set out our detailed responses to the AAP in our submission, and to the SA in this Addendum. We add here that **neither the SA nor the AAP give any reasonable justification for why commercial expansion and the construction of new housing should be in this particular area of central Wood Green as opposed to another:** eg. why does it encompass one segment of Mayes Rd and not another? Why include Caxton Rd while excluding the adjacent Parkland Rd? We state this not to encourage demolition of houses elsewhere, merely to point out the arbitrary nature of the decision: an expanded retail area and increased housing could be achieved as much (if not better) in one area than in another. The 'detailed appraisal' offers no reasonable justification for the selection of these streets in particular.

We reiterate our contention that creative modifications to the AAP can be made to achieve the overall objectives without the demolition of these homes, and without the permanent dispersal of the local community resident on Caxton Rd and Mayes Rd.

We urge the Council to listen to local residents, in keeping with its commitment 'to ensure that investment decisions meet the aspirations of the local community'.