

**Comments to the  
Schedule of Minor Changes**

*Issued by:*

**Avenue Gardens Residents Association**

V2.3 01 June 2011

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## **1 Introduction**

1.1 This statement of comments to the Schedule of Minor Changes to the Haringey Core Strategy has been prepared by the Avenue Gardens Residents Association (AGRA).

1.2 AGRA covers the area centred around Avenue Gardens, some 650 households, reflecting the general ethnic makeup of the Borough of Haringey. The AGRA area comprises the following streets:

- Barratt Avenue, Bounds Green Road (part to the High Road), Bradley Road, Bridge Road, Buckingham Road
- Cumberland Road, Dorset Road, Park Avenue, Ranelagh Road, Ringslade Road, River Park Road, St Michael's Terrace
- Selborne Road, Station Road, Terrick Road, Tower Terrace, Warberry Road, Watsons Road, Wolseley Road, Wood Green Common.

1.3 The AGRA area includes the Conservation Area of Wood Green Common, and borders Trinity Gardens CA. The area also includes listed buildings, and an Ancient Monument (The New River). The area encompasses two of the most heavily used roads in the Heartlands scheme, Station Road and Park Avenue. AGRA is mostly in Woodside ward, with some streets in Bounds Green and Noel Park wards.

1.4 Any correspondence or enquiries concerning this submission should be addressed to:

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## **2 List of AGRA points to which the Council has not responded.**

AGRA notes the Council has not responded to many of the points submitted by AGRA to the Core Strategy consultation. Further, the Council has offered no reasoning as to why the Council has not responded. The issues raised thus remain open. The following schedule lists the AGRA reference numbers to which no response has been made:

2, 3  
5, 6, 7  
9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26  
28, 29  
33, 34, 35, 36, 37  
39, 40, 41, 42, 43, 44, 45, 46, 47  
49, 50,  
52, 53, 54, 55, 56, 57, 58  
60, 61, 62, 63, 64, 65, 67, 68, 69  
71, 72, 73, 74, 75, 76, 77, 78, 79, 80  
82, 83, 84, 85  
87  
89, 90, 91, 92  
94  
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98, 99, 100, 102, 102  
105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121  
123, 124, 125, 126  
128, 129, 130, 131, 132, 133, 134, 135, 136

### **3 Points incorrectly ascribed to AGRA**

AGRA notes the Council has ascribed some issues and amendments as in response to AGRA (reference number 4) which cannot be matched to our consultation written submission. These appear to be a case of mistaken identity. The list of amendment points falling into this category are listed below:

#### **3.1**

1.3 Making Haringey Distinctive 16/1.3.2 Fig 1.4 All maps in chapter 1.3 to be amended and updated prior to adoption to provide clarity and consistency. To provide clarity as recommended by Montagu Evans on behalf of Lee Valley estates, Highgate Society and internal London Borough Haringey Officers

42/4/1.3

28/1/1.3

#### **3.2**

1.3 Making Haringey Distinctive 20 Places box In "places" box of Tottenham & Seven Sisters Area Assembly, insert another bullet "Part of Lee Valley Regional Park is located here". Clarification of wording recommended by Lee Valley Park Authority.

35/4/1.3

#### **3.3**

1.3 Making Haringey Distinctive 36/1.3.35 Remove paragraph. Recommended by Highgate Society.

28/4/1.3

#### **3.4**

3.1 SP 1 Managing Growth 60/3.1.9 The last sentence should read: 'There is significant scope for the enhancement of these areas while respecting their industrial heritage and the provision of....' For clarity and consistency and in line with comments received from Alexandra Palace and Park CAAC.

1/4/3.1

#### **3.5**

4.2 SP5 Water Management and Flooding 98 SP5 3rd bullet point to read: 'All development in these areas will take account of the flood risk vulnerability classification as set out in Table D.2 in PPS25 and will apply the PPS25 Sequential Test and Exception Test' To address comments raised by CgMS on behalf of the Metropolitan Police.

7/4/4.2

### **3.6**

#### 6.3 SP13 Open Space and Biodiversity 154/6.3.14

Allotments After second sentence insert new sentence to read: 'The standard as set out in Haringey's Open Space and Recreational Standards SPD 2008, says that there should be 0.24 ha of allotment space per 1000, with all residents having access to an allotment with 800m of their home.' For clarity and improved referencing and in line with comments received from HAF

23/4/6.3

### **3.7**

#### 7.1 SP 14 Health and Well-being 168/7.1.22

In first sentence of 7.1.22 (after 'key role in ') insert: encouraging children, young people and adults to engage in more physical activity, play, recreation and sports which could lead to...' For consistency and in line with comment received from Haringey Play Association (HPA).

25/4/7.1

### **3.8**

#### 7.1 SP 14 Health and Well-being 171/7.1.31

Insert sentence at end of paragraph to read: 'The improvement of town centres in Haringey is addressed in SP10 and improved access to open spaces is dealt with in SP13.' Improved referencing and in line with comments received from HUDU

46/4/7.1

### **3.9**

#### 7.1 SP 14 Health and Well-being 173 Key evidence and references

Include additional reference: Healthy Weight, Healthy Lives (2008), Department of Health' Improved referencing and in line with comments received from HPA

25/4/7.1

### **3.10**

#### 7.1 SP 14 Health and Well-being 173 Key evidence and references

Insert additional reference: 'Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation, 2008 Greater London Authority' Improvement to referencing and in line with comments received from HPA

25/4/7.1

## **Comments to the schedule of minor changes:**

### **4 1.3 Making Haringey Distinctive**

14/1.3.1

Haringey's economy

AGRA issue #8

The amendment is not adequate. All employment land is worthy of protection, whether it is in a DEA or not.

### **5 1.3 Making Haringey Distinctive**

16/1.3.2 Haringey at a glance

AGRA issue N/A

The amendment to add energy hub opportunities to all the areas listed is not consistent with the existing text on energy hubs and their locations at para 4.1.81, page 96. In addition we question whether this high level juncture is the appropriate points to introduce the topic of 'energy hubs'.

### **6 1.3 Making Haringey Distinctive**

31 Figure 1.9

AGRA issue N/A

The amendment proposes to change the designation of Haringey Heartlands in Figure 1.9. The current designation shows the Haringey Heartlands as an Employment Area. The same colour and legend is used to indicate areas in other locations that are Employment Areas as well. The colour key and legend arrangements for all the maps in the CS in this section are uniform.

The area indicated as the Haringey Heartlands is identical to the area shown in the Heartlands Development Framework 2005.

There are no amendments to change the colour and legend of the Employment Areas on the other area maps.

The Haringey Heartlands are shown as a Designated Employment Area (DEA19) in the UDP 2006 Proposals Map. The Heartlands Development Framework 2005 states (page 15) an objective to create a net additional 1,500 jobs by 2016 in the Haringey Heartlands.

The CS itself in Figure 5.1 at page 116 shows the Haringey Heartlands as a Locally Significant Industrial Site (LSIS). Arguably, given the scale of employment opportunity presented by the Haringey Heartlands should be designated as a 'Strategic Industrial Location', or SIL.



The proposed amendment to change the designation (to what ?) is therefore unsupported.

## **7 1.3 Making Haringey Distinctive**

38 Opportunities box  
AGRA issue N/A

The amendment proposes to add the ‘Pinkham Way waste management site’ to the list of opportunities for the Muswell Hill Area.

The amendment is proposed with no justification as to why the waste site project should be mentioned at this strategic level. This looks like post facto rationalisation on the hoof.

The amendment should be rejected.

## **8 2.1 Haringey's Spatial Strategy**

54 Figure 2.1  
AGRA issue N/A

The amendment proposes to de-designate the Haringey Heartlands as Strategic Industrial Land in Figure 2.1.

The current designation shows the Haringey Heartlands as Strategic Industrial Land. The area indicated as the Haringey Heartlands is identical to the area shown in the Heartlands Development Framework 2005.

The Haringey Heartlands are shown as a Designated Employment Area (DEA19) in the UDP 2006 Proposals Map. The Heartlands Development Framework 2005 states (page 15) an objective to create a net additional 1,500 jobs by 2016 in the Haringey Heartlands.

The CS itself in Figure 5.1 at page 116 shows the Haringey Heartlands as a Locally Significant Industrial Site (LSIS). Arguably, given the scale of employment opportunity presented by the Haringey Heartlands should be designated as a ‘Strategic Industrial Location’, or SIL.

No rationale is given as to why long standing and agreed policy (HH Development Framework 2005, and UDP 2006) is being changed without proper discussion of whether it is strategically needed in the Borough, or for the Borough to be more sustainable.

The proposed amendment to change de-designate the Haringey Heartlands is therefore unsupported by evidence.

**9 3.1 SP 1 Managing Growth**

61 The Council's aspirations for Haringey Heartlands:

AGRA issue N/A

The amendment proposed by Network Rail wishes to make the 'safeguarding of operational railway land' a strategic aspiration for the Borough.

With all due respect to Network Rail, this must properly be one of its strategic aspirations, but hardly one for the Borough. Network Rail has many powers and rights granted to it in order to protect the operation and future development of its railway.

The proposed amendment is therefore not supported.

**10 3.1 SP 1 Managing Growth**

67/3.1.17

AGRA issue #27

The amendment is welcomed.

**11 3.1 SP 1 Managing Growth**

67

AGRA issue #30

The amendment is welcomed.

**12 3.1 SP 1 Managing Growth**

69/3.1.25

AGRA issue #31

The revised text states that: "At school level, performance has been improving at St Francis de Sales and Northumberland Park Community School. As of 2010, both schools have been improving faster than the national average in terms of either the % 5+A-C\* (including English and maths) or KS2, reflecting significant improvements in recent years in Northumberland Park ward."

This revised text is not supported by school performance data from the Department for Education.

St Francis de Sales Junior School (Primary)

Level 4

i) St Francis de Sales improved faster than the national average in terms of KS2 across the three core subjects at Level 4 between 2006 and 2008

ii) St Francis de Sales did not improve in terms of KS2 across the three core subjects at Level 4 between 2008 and 2009. Both the school and the national average fell slightly that year.

iii) According to the Department for Education website, St Francis de Sales has no published results at Level 4 for 2010 because it refused to administer the 2010 KS2 tests.

The school aggregate scores across the three core subjects at Level 4 were 206 in 2006, 235 in 2007, 256 in 2008, and 255 in 2009.

The England (all schools) aggregate scores across the three core subjects at Level 4 were 242 in 2006, 245 in 2007, 248 in 2008, and 247 in 2009.

The data therefore shows that at St Francis de Sales performance at KS2/Level 4 improved between 2006 and 2008 and at a rate higher than the national average, but performance fell slightly between 2008 and 2009, and no data exists for 2010.

#### Level 5

i) St Francis de Sales improved faster than the national average in terms of KS2 across the three core subjects at Level 5 between 2006 and 2007

ii) St Francis de Sales did not improve in terms of KS2 across the three core subjects at Level 5 between 2007 and 2008. Both the school and the national average fell somewhat.

iii) St Francis de Sales did not improve in terms of KS2 across the three core subjects at Level 5 between 2008 and 2009. The national average rose very slightly that year.

iv) According to the Department for Education website, St Francis de Sales has no published results at Level 5 for 2010 because it refused to administer the 2010 KS2 tests.

The school aggregate scores across the three core subjects at Level 5 were 55 in 2006, 105 in 2007, 103 in 2008, and 86 in 2009.

The England (all schools) aggregate scores across the three core subjects at Level 5 were 111 in 2006, 112 in 2007, 106 in 2008, and 107 in 2009.

The data therefore shows that at St Francis de Sales performance at KS2/Level 5 improved between 2006 and 2007 and at a rate significantly higher than the national average, but performance fell considerably between 2007 and 2009, and no data exists for 2010.

## Northumberland Park Community School (Secondary)

%5+A\*-C GSCE (including English and maths)

i) Northumberland Park Community School improved faster than the national average between 2006 and 2008

ii) Northumberland Park Community School did not improve between 2008 and 2009. The national average rose that year.

iii) Northumberland Park Community School improved between 2009 and 2010 by marginally more than the national average (the school increased by 5 percentage points compared with a national average increase of 4.5 percentage points).

The % of Northumberland Park Community School pupils achieving 5+A\*-C (including English and maths) was 20% in 2006, 32% in 2007, 38% in 2008, 35% in 2009, and 40% in 2010.

The % of pupils in state funded schools in England achieving 5+A\*-C (including English and maths) was 44% in 2006, 45.6% in 2007, 48.2% in 2008, 50.7% in 2009, and 55.2% in 2010.

The data shows that performance at Northumberland Park Community School was substantially lower than the national average in each of the years 2006 to 2010. The gap reduced between 2006 and 2008, widened between 2008 and 2009, and narrowed marginally (by 0.5 of a percentage point) between 2009 and 2010.

The data shows performance has been patchy, showing decline in the primary schools since 2007/2008 and marginal increase at the secondary school since 2008. Effective tackling of the social problems and educational deprivation in the area requires the Council to acknowledge this evidence and work with the schools in the area to achieve the necessary improvements.

In a preface to the revised text the Council comments that “education is a fast moving field and performance can change in the short period between drafting and publishing a Core Strategy.” AGRA notes that:

i) the relevant performance measures referenced are annual tests/examinations, so it takes one year to obtain one additional set of performance data

ii) According to the Department for Education website, St Francis de Sales school has no published KS2 results for 2010 because it refused to administer the 2010 KS2 tests. The latest year for which performance data is available (as at June 2011) is therefore 2009.

### **13 3.1 SP 1 Managing Growth**

72/3.1.35

AGRA issue #32

The amendment is welcomed.

### **14 3.2 SP 2 Housing**

80/3.2.8

AGRA issue #4 and #38

The amendment does not deal with the issue raised by the Inspector at the UDP 2006 Inquiry concerning the London Plan Matrix. The Inspector required the Council to identify the Central, Urban and Suburban areas of Haringey, with reasoned justification and shown clearly on an accompanying map.

The emerging Area Action Plans mentioned are not a general policy of Borough-wide applicability.

Without the identifications, justifications and map proposed by the UDP 2006 Inspector, it begs the question as to how the Council can satisfactorily “assess housing densities in planning applications in line with those set out in the London Plan Density Matrix”.

### **15 4.1 SP4 Working towards a Low Carbon Haringey**

94/4.1.15

Decentralised energy

AGRA issue #48

The amendment states that the Council will “monitor whether there are any more efficient schemes to fulfil this function”. Heat pumps are already a more efficient scheme than gas or waste fired CHP schemes. Further, CHP systems are only more efficient than individual gas fired boilers and centralised electricity production under limited service conditions.

Before enshrining obsolete central government advice in policy, the Council is again urged to consider the discussion by the former Energy Adviser to the Government of this topic in “Sustainable Energy Without the Hot Air”, pages 147-154, David JC MacKay, 2008, available free online at [www.withouthotair.com](http://www.withouthotair.com).

We also note the total absence of guidance; for example studies show that the energy saved by low-energy lighting has been used by new ‘black’ goods, such as flat screen TVs.

## **16 4.4. SP7 Transport**

105 SP7

AGRA issue N/A

The amendment proposes to add to SP7 an activity to promote ‘car free housing wherever possible’.

The assumption is that car-reduced and car-free accommodation reduces the number of car journeys. The pursuit of car-free and car-reduced housing by policy has been in effect long enough (5 to 10 years) for the impact of this measure to be assessed.

Maximum residential car parking standards do have negative effects. Residents in car free or car reduced developments often still have a car, they simply park it in a non-CPZ street, or they acquire a CPZ permit to park in a CPZ street. Car parking pressure and stress in residential streets is thus increased with absolutely no reduction in car travel. “Car free” developments have been allocated residents parking permits because the accommodation could not otherwise be sold, for example Eclipse House in Station Road, N22.

The fact is, car journeys and traffic trips are rising inexorably throughout the Borough and this needs to be addressed by other policy. It is appropriate for the Council to undertake research so as to justify continuing with car free and car reduced developments and to justify continuing to create disbenefits for other residents. If the policy is not effective, it should be abandoned. Evidence is needed in this matter.

## **17 4.4 SP7 Transport**

108/4.4.8

AGRA issue #51

The amendment states that the Council will endeavour to control “construction traffic”. The transport issue concerns all HGV traffic in the Borough, not just “construction traffic”. The proportion of construction traffic as a proportion of all HGV traffic is miniscule. To limit discussion to construction traffic is not acceptable.

The Council’s proposed amendment concerning construction traffic in particular, while welcome in itself, is irrelevant to the actual issue of HGV traffic in general.

Policy is needed to address HGV traffic in and through the Borough, especially through residential areas.

**18 5.1 SP8 Employment**

114/5.1.4

AGRA issue #59

The Council amendment proposes that employment land will be released to other purposes with the constraint that 'Each case will be looked at on merit, having regard to all material considerations.'

This is not an adequate response to the issue of protecting employment land. Policy should be giving a clear direction on this issue. It may have escaped the Council's notice that ALL applications are considered on their planning merits.

**19 5.1 SP8 Employment**

118/5.1.21

AGRA issue #70

The amendment is broadly welcomed.

**20 5.3 SP10 Town Centres**

128/5.3.13

AGRA issue #81

The amendment is broadly welcomed.

**21 6.1 SP11 Design**

SP11 In policy box SP11, second section on tall buildings

AGRA issue #86

The amendment is broadly welcomed.

**22 6.1 SP11 Design**

141/6.1.15 - 6.1.22

Supporting text on Tall buildings

AGRA issue #88

The entirety of the proposed new paragraphs is unreadable in the Council's document. It is not clear what is being proposed – clarification is needed.

AGRA would prefer tall buildings to be specifically excluded from the Borough. The existing tall buildings without exception detract from the character of the Borough and impact negatively on the adjacent sites and buildings.

**23 6.3 SP13 Open Space and Biodiversity**

150 SP13 Open Space and Biodiversity

AGRA issue N/A

The sense of the proposed amendment is that developers can substitute existing public and open space in place of their obligation to provide play space in their developments.

This is unacceptable. The amendment should be rejected.

**24 6.3 SP13 Open Space and Biodiversity**

151/6.3.4

AGRA issue #93

The LBH response at 151/6.3.4 does not adequately offer protection, and indeed introduces an assessment of 'identifiable value'. The assessment criteria are not stated. Designated Open Space is open space of quality and that should be recognised. The policy at UDP 2006 should not be weakened. Retain the UDP 2006 wording as suggested.

**25 6.3 SP13 Open Space and Biodiversity**

151 Image

AGRA issue #95

The amendment is welcomed

**26 6.3 SP13 Open Space and Biodiversity**

158/6.3.23

AGRA issue #97

The amendment does not address the issue of the missing 4 sites of Ecological Value listed in the UDP 2006 Schedule 11 but not identified as one of the 60 SINC's. The reference to Shepherds Hill Gardens is not clear. Is this another SINC ?

**27 7.1 SP 14 Health and Well-being**

168/7.1.20 and /new para after 7.1.21

AGRA issue #103

Simply stating that the forecast incremental new population could be served by an additional 6-8 new GPs and otherwise ignoring the state of the current provision is unacceptable and not appropriate.

Presumably the LA has evidence of either the need or present overprovision ? Or is the case that doctors' lists are already much larger than the planning figures which are assumed in this plan. It is the experience of many residents at present that it is



difficult to get appointments and sometimes difficult to be accepted onto a surgery's list.

**28 7.1 SP 14 Health and Well-being**

168/7.1.20 and /new para after 7.1.21  
AGRA issue #104

The Council admits that the Polyclinic Programme is now uncertain, but offers no policy changes to reflect this uncertainty. This cannot be sensible.

**29 7.2 SP 15 Culture and Leisure**

177/7.2.10  
AGRA issue #122

The amendment is welcomed.

**30 8.1 SP 16 Community Infrastructure**

186/8.1.4  
AGRA issue #127

The amendment is broadly welcomed.

**31 8.1 SP 16 Community Infrastructure**

186/8.1.5  
AGRA issue N/A

The amendment introduces the notion of 'no net loss of community facilities' into what was a clear and un-ambiguous directive to 'protect existing facilities and deliver new infrastructure.'

There are no limitations of location, access, single point of use, compatibility between communities and so on which have to be considered in the process of 'netting-off' the benefits and dis-benefits of developers proposals.

This cannot be wise. The amendment should be rejected.

**32 8.1 SP 16 Community Infrastructure**

188/8.1.14  
AGRA issue N/A

The amendment asserts that the Heartlands High School is open. The location of the new school should now be shown in Figure 8.1 on page 189.

### **33 9.5 Appendix 5**

232 Glossary of Terms

AGRA issue N/A

The amendment proposes a definition of tall buildings to read: "Buildings or structures that are significantly taller than surrounding development".

However, the CS itself at page 141, para 6.1.17 states that:

'The Council has adopted the definition of tall buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10 storeys and over.'

The proposed amendment is not compatible with the Council's previously stated definition.

The amendment should therefore be rejected. If a glossary item is thought needed for 'Tall Buildings' then the Council's previously consulted upon text at 6.1.17 should be used.

34 ends.