

Respondent Name: Page Green Residents Association

(Submitted through online Snap survey)

Document	Policy/Para number	Legally compliant?	Sound?	Complies with DtC?	Please give further comments.	Please set out suggested changes	Do you wish to attend the oral examination?
DM DPD	DM 18 Restricted Conversion Areas/ HMOs (unsure of the number)	No	No	No	<p>(We were just about to submit this Pre-Submission consultation at 4:45pm, when we pressed the back button to check on the previous page, and the whole of our consultation submission went blank. So we contacted Mercy in Planning and she said that, although it was after 5pm we could resubmit. We are now having to rewrite our submission) We are opposed to Option 1: 'Restricted conversion area'. We strongly support Option 2: 'No restricted conversion areas'. (4a) Not Legally Compliant 1, The adoption of Option 1, 'Restricted conversion area' is not compliant with the Statement of Community Involvement, as the Council has not adequately consulted with residents as to their adoption of this Option. Page Green residents have made it clear to Planning and to the local Tottenham Green</p>	<p>Under Table B: Sets of Alternatives That Have Been the Focus of Appraisal We are opposed to Option 1: 'Restricted conversion area'. We strongly support Option 2: 'No restricted conversion areas'. *To make Option 2 more compliant with Statement of Community Involvement criteria, we suggest that this option be open to neighbourhood referendum as was the Article 4 Direction on HMOs. Legality 1. Option 2 is compliant with Statement of Community Involvement as it is based on resident and councillor feedback and experience. 2. It is sustainable as it will improve the social, economic and environmental outlook of the community, by supporting home ownership and community coherence and is a buffer against drugs, prostitution and exploitation 3. It supports the national policy by supporting home ownership and affordable housing. Soundness 1. Option 2 is justified as it is an</p>	No

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				<p>councillors that they do not want a restricted conversion area, "In our opinion Option 1 became the preferred option of Planning without Planning knowing, or seeking to know, the long Tottenham history of difficulties with Homes of Multiple Occupation that occurs when conversion into flats is seen as less profitable than retaining a large family house and renting out every room at exorbitant prices, often with: whole families living in one room with children sharing bathrooms with unrelated adults who are repeatedly inebriated or worse; overflowing rubbish bins; hot-bedding; prostitution; and drugs. (Let us point out here that these terrible conditions have not once been tackled by Haringey Planning Enforcement without enormous pressure by local residents, who have sometimes had to resort to contacting national news outlets. And now Haringey Council proposes to continue this situation!) 2. Option 1 does not conform generally with regional</p>	<p>option based on sound resident evidence and evidence that can also be supported by Haringey Planning Enforcement records. 2. It is an appropriate alternative strategy to Option 2 because it does more good than harm, whereas Option 1 does the opposite. 3. Option 2 is effective and deliverable as it is not dependent on Haringey Enforcement. 4. It is flexible, as owners are not forced to convert, whereas, in Option 1 owners are not allowed to convert, even if they wish to. 5. It is consistent with national policy in that it supports home ownership.</p>	
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				<p>policy as set out in the London Plan. Regional policy supports home ownership. Option 1 will make home ownership less possible. Furthermore, In SA of the Site Allocation DPD, Housing (page 14) it states, Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%). Option 2, 'No restriction of conversion' supports conversion into flats of big homes, and therefore, will facilitate not only homeownership but more affordable housing whilst Option 1 supports family homes becoming HMOs. 4. It is not in line with Haringey's Sustainable Community because Option 1, which restricts conversion, and therefore, encourages large houses being brought by developers and turned into HMOs. HMOs in our area, at our urging, now have to be licensed. But as Planning Enforcement currently has nobody working in the department and has been</p>		
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				<p>understaffed for the past 20 years, enforcement forces the community to put up a superhuman effort to get Planning Enforcement to take action. HMOs are running our neighbourhoods down in every way. On the other hand, residents living in flats, which were converted from houses, are much-appreciated members of our community. We have found flat owners are far more responsible than HMOs transient population and, moreover, are as home owners, eager to contribute to the well being of our neighbourhood. Therefore, conversions support sustainability, whereas the availability of large houses for landlords to turn into HMOs does not support sustainability. 4b. Not Sound 1. Option 1 is not supported by evidence. The Council response to our original submission to the Local Plan states, " In order to help support and deliver mixed and balanced communities, the Council has considered a range of housing</p>	
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				<p>options across the borough. The DM Policies Local Plan proposes an approach to restrict the conversion of family homes in certain areas and this has been tested against a 'no restriction approach' as part of the sustainability appraisal process in considering reasonable policy alternatives. The appraisal has concluded that there are likely positive effects associated with the proposed policy." We residents have never seen this sustainability appraisal. So we have had no chance to evaluate it. Thus the evidence that the Council puts forward is not evidence at all. Moreover, local Tottenham Green councillors can attest to the evidence that large houses, brought by landlords to create HMOs, create a large part of the planning problems in our area, whereas, houses created into flats certainly do not. 2. Option 1, 'Restricted conversion area' is not the most appropriate strategy. Option 2 is the most appropriate strategy. 3. Options 1 is not deliverable. The Council</p>	
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					<p>response to our initial submission is that "The concerns regarding HMOs are noted. The Council recognises that HMOs play a part in meeting particular local housing needs. In response to many of the problems associated with poor quality HMOs, an Article 4 Direction was introduced in November 2013 which removed permitted development rights for conversions to small HMOs within the east of the borough. The proposed Local Plan policy DM23 sets out requirements for HMOs, and this will apply to proposals for HMOs or 6 or more people and smaller proposals within the Article 4 Direction area. The policy will ensure that HMOs are developed to the appropriate standard and positively contribute to their communities. Where developments are in breach of these requirements, this will be dealt with via planning enforcement which is outside the scope of the Local Plan." First, despite the Article 4 Direction in</p>		
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					<p>November 2013, there have been an increasing amount of problem-generating HMOs in our neighbourhood. So the Council has demonstrated that it is not able to effectively deliver enforcement or even monitor this Directive. Secondly, how can the Council say that enforcement is outside the scope of the Local Plan, when deliverability and evidence is one of the criteria of this plan? 4. Option 1 is not flexible in that it does not take a case-by-case position. Instead it just restricts without adequate evidence. 5. This restriction of conversion works against the National Policy to encourage home ownership because it will disallow conversion into smaller properties, which would be more affordable thus facilitating home ownership.</p>	
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