### Haringey's Local Plan - Development Management

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#### Referring to the link:

http://www.haringey.gov.uk/sites/haringeygovuk/files/06\_haringey\_dmp\_dtp\_221215.pdf

#### **General comments**

## The plan should include clear regulations to assist good practice in Haringey planning committees.

The plan does not reassure residents that their interests will be protected at a time when local land value is high, making it profitable for speculators to invest in over-development in order to reap a high return.

Favoured developments are for houses & flats for sale, closely packed with high densities; these will not be available to ordinary workers. Haringey needs the workers that are being priced out of accommodation in the borough.

Even the very weak obligation to build 'affordable' homes is frequently dodged, as the policy set out on in DM13 page 28 does not apply to sites with fewer than 10 additional homes.

Too few rented homes are provided and the term 'affordable' is based on local market prices rather than on local average earnings. Most building taking place will not be available to key workers, or low paid workers.

The Development Plan should, within its powers, set out regulations that will make sure that developments are not the slums of the future. The regulations should be clear and include specifications that developers are not allowed to ignore.

Planning committees should be discouraged from setting aside recommended separation distances, heights, basement depths and densities. Building Control also needs to be robust.

Current practice is that planning guidance is vague. The vague guidelines make it possible that applicants for planning permission could appeal a rejection and win compensation. Councillors serving on Planning Committees are thus prevented from judging correctly whether the application damages the amenity of residents.

Also, the process does not enable them to assess the overall and accumulative impact of a succession of developments upon the local environment.

### Specifications in earlier policies should not be weakened.

Separation distances for residential buildings were specified in the Housing SPD (revoked November 2014) and included in consultations last year.

The prescribed separation distances were at least 20m at first floor level for facing habitable rooms, with an additional 10m for each additional floor, implying that for four-storey buildings the separation distances should be 40m.,

It was developers that requested withdrawal on this policy. If this policy is not restored future crowding of residential homes can easily be imagined. Residents not developers should set down minimal standards.

The earlier stipulated distances have been signally flouted in a development given planning permission near my house. [5-9 Connaught House HGY/2015/1956]

## Please include specified minimum distances

Section DM1 page 11 bullet point D.

It is not sufficient to make vague requirements relating to overlooking and privacy. The aspirations expressed in 2.9 cannot be achieved without recommended distances. **Building heights** are mentioned in DM6, but in relation to those areas where very high buildings are to be allowed. DM6 Page 17 Policy A says

For all development proposals, the Council expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1

This should also apply to backland developments, but there are no specifications on maximum heights allowed for new build that could affect how the aspirations expressed in section DM1 could be achieved.

<u>Please insert that, in general, within residential settings, new buildings should not exceed the height of existing homes.</u>

# Minimal specified heights and separation distances need to be added to section DM7 on backland developments.

In section DMY, page 19 - 20, points 2.44 - 2.48 admit the necessity of allowing backland developments to meet the Borough's housing needs and correctly indicate that policy set out in earlier needs to be observed, but without specified rules.

This is precisely the type of development where residents' amenity may be damaged. This is acknowledged on page 19 bullet points B – in particular d, but no specifications for distances, heights or densities are included. Applicants with strong investment interests are bound to submit arguments to satisfy such a vague policy.

Also, what is not said is that the <u>permitted new homes may not be affordable</u> – and thus do not satisfy the needs of the Borough.

Note that the development behind my house was originally Social Housing; even well-paid key-workers are not likely to be able to purchase homes in the new development.

The obligation to provide 'affordable housing was avoided, by two developers making separate applications for two parts of the site, both parts for fewer than 10 new dwellings, although they cooperate for building operations. HGY/2015/1956

I am not sure how the applications escaped the clause in DM 13 page 29

The affordable housing requirement will apply to: Sites that are artificially sub-divided or developed in phases;

#### **Housing supply and mix.** DM10 & DM11

The assurances under DM10, including mixed use, repair of existing homes etc. are good for the community. DM11 refers to mix referring to size & occupancy, but social mix should also be promoted. One good thing that came of the 'Right to Buy' is that tenants and owner-occupiers live side-by side. Developers often seek to segregate tenants and home-owners, and this should be vigorously opposed.

## **Special Needs Housing DM15**

On page 31 for DM15, point 3.28 includes the needs of older people.

Support for **home adaptation** should be specifically promised. Also greater provision of **homes suitable for older people**, to rent or to buy should be a council priority. This may contribute to freeing up family homes that are badly needed.

#### **Residential Conversions DM16**

Front gardens converted to hard standing is included. More advice and guidance should be given to residents to conserve gardens; in particular residents should be advised to use paving with absorption properties to avoid heavy rain putting a strain on drains.

#### **Basements** DM18

Residential conversions are making increasing use of basements. Guidelines are given in DM18, but building control needs to be active in checking that water courses and neighbouring properties are not badly affected.

#### Open Space DM20

The recommendations in DM20 should be applied in backland developments.

The green open space used for children's play has been lost in the approved development behind my house. In addition 5 mature lime trees were felled before the developer submitted his application. Both are a loss to the local environment. HGY/2015/1956

Existing rules are not stringent enough to avoid loss of open space. SP13 should be examined to see how the regulations and council scrutiny can be tightened up.

### Responsibility to Haringey Residents

Government policy makes council controlled building of homes difficult, but the plan should reference the 'Haringey Housing Needs Assessment June 2007'. Since then the situation will have been made worse; the shortfall of 3,405 social units/year over the following 5 years.

The plan should indicate how Haringey intends to minimise the impact of government cuts and austerity policies on low-income household in the borough. The plan should retain with proper investment the borough's council housing estates. A substantial new build programme for rented council homes is needed together with schemes for new build protected against the 'Right to Buy' Act so that the housing stock is not eroded.

Demolition of housing estates is not the best solution, being disruptive for families schooling etc. with some not having secure tenure to support them during the renovations or in the interim. This method destroys local community support networks. It also involves partnership with large companies with all their commercial interests to contend with. To date there are over 3,000 council homes at risk of demolition.

The policy that reduces council homes must be reconsidered in favour of a policy that respects communities and increases the stock of secure affordable tenancies.