

Local Plan Consultation,
Planning Policy,
River Park House,
225 High Road
N22 8HQ

Fr Luke Miller
Archdeacon of Hampstead
archdeacon.hampstead@london.anglican.org
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19th March 2015

Dear Mr Kelly,

Draft local plan consultation.

Thank you for your invitation to comment on these planning documents:

- Tottenham Area Action Plan Preferred Option Consultation
- Haringey's Local Plan – Alterations to Strategic Policies
- Local Plan Development Management Options
- Draft site allocations document

I write in my capacity as Archdeacon of Hampstead, as part of the response from the Church of England. We have thirteen parishes in the Eastern part of Haringey and another twelve in the West. Each is a separate charity and many will respond individually in addition to this response. Our structure enables us to speak from highly local contexts and to reflect concerns from street level which will therefore have different emphases and raise different issues. Many of our parishes have projects that could be the beneficiaries of S106 and CIL funding in support of the local community. It is part of my role to help the local churches to articulate their own concerns, and for myself to write with a wider diocesan view.

I welcome these plans and the consultation. The prospect of such growth in the Borough and Tottenham in particular could bring many benefits provided that it undertaken very carefully. We have no comments to make from the Diocese on the Site Allocations Document. Our comments below refer to the whole set of documents except where we refer to individual ones.

- 1) **Faith** seems to be underplayed as an important social driver in the area –you will be aware that Tottenham is an area of great strength and growth of faith organisations, yet this is not well mentioned or explicitly planned for. Faith organisations often provide affordable and sustainable community facilities but this does not receive the recognition needed. Paragraph 2.27 attempts to cover social infrastructure but makes no mention of faith.
- 2) **Housing and Social justice** – These comments are related to Haringey's Local Plan – Alterations to Strategic Policies: It is noted that there is a shortfall of affordable housing of 11,757 across the Borough. These plans contain a great deal of upheaval for social housing tenants and it is vital that the Council is confident that it can

deliver such an ambitious programme with real social justice and ensuring that housing is genuinely affordable to those most in need. This is just one example from among these ambitious plans where it is not just what is being planned but, why and how, things are done that will matter.

Some specific points arise as follows:

- Page 16 Lists **growth areas** – what ethics are involved in choosing these areas as “most suitable”?
- What (Page 17) is the nature of the links to and benefits for ...communities?
- Page 20 uses the term “regenerate social housing estates” - does this term not need more definition?
- Page 56: This section is intended to enable monitoring of the plan but there are no measures for what successful “regeneration” of housing estates means.

Page 21 **Reduction in affordable housing targets to 40%**, this is regrettable given the acknowledged need for affordable housing. There is a question as to why more public housing investment is not being planned for? Page 22 SP2 suggests that thousands of social homes will be demolished mostly on post-war estates. Is there not another way of more selectively improving and adding to existing estates? Page 25 Alt 59 raises the question as to how affordable is affordable? 3.2.20 addresses this but is the policy framework strong enough for the Council be able to insist on this?

- 3) **Community facilities** – the sections on community infrastructure are welcome but there is little evidence of strategic planning for the communities’ many and varied needs. Our parishes make their church halls and sometimes also the churches available to the public and thereby provide a significant proportion of the venues and facilities that are available to the community for meetings, groups and celebrations. Your aims of “creating 10,000 additional homes, 5000 jobs and ... community infrastructure,” “specifically new schools and healthcare” understate the planning that is needed for successful communities. The latest version of the Community Infrastructure Study appears to be 2010, and is therefore likely to be out of date, not least in the light of the events of 2011. The Study needs updating for these new plans to reflect the increase in housing proposed under the Housing Zone. The study estimates that there are 1700 active Third Sector Organisations in Haringey but there is little integration of this potential in these new plans.

In the Local Development Management Development Plan, Chapter 6 Community Infrastructure, policy DM59 A(d) requires “no significant impact on road safety or traffic generation”. This could be problematic for Churches or any other successful community facilities. It could be expected that a successful and sustainable community facility will generate traffic as community facilities are not solely for local people but also for communities of interest, those who have mobility difficulties and others with a valid reason for vehicular access.

- 4) **Schools and young people** – Given that 41% of Tottenham children live in poverty, there is some of the highest unemployment in London, and 44.9% of all 10 and 11 year olds either overweight or obese we will be keen to work with you on how to

enhance services from nursery through to youth. You will be aware of the nursery provision we are to provide at Tottenham Hale. It would seem that much more in depth planning is needed to address the opportunity of a healthy and more prosperous future for young people. The London Diocesan Board for Schools, which is one of the most significant providers of school places in Tottenham and throughout the Borough, will welcome further discussions with you about providing for school growth.

- 5) **Local employment:** Page 13 of the Haringey Local Plan – Alterations to Strategic Policies 2011-2026, forecasts population increases in many neighbourhoods. 22,000 extra homes also 22,000 jobs. To make sure that local people are ready for these jobs we need an active third sector with resources and places from which to operate.
- 6) **Betting shops** – it is good to see the limitations proposed on betting shops and it is hoped that these will be as strong as the law permits. It would be good if the Council could equally promote beneficial uses such as premises for Credit Unions.
- 7) **Heritage and the protection of local views.** It is disappointing that Paragraph 2.35 of the Tottenham Area Action Plan in providing a long list of heritage assets makes no mention of the listed Church buildings. These range from the medieval and Tudor All Hallows church which is one of the most significant heritage assets in the Borough through a number of very fine Victorian buildings to the award winning S Paul's Haringay which is one of the best churches of the late 20th century. These are maintained for the community largely at the expense of the parishes concerned. Protecting views of local Churches is very important if people are to feel proud of where they live and find their way around. It is unfortunate that other authorities have allowed the views of St Paul's Cathedral to be despoiled but we would hope that this view and that of other landmarks that signify London (e.g. Alexandra Palace) should be protected. It is welcomed that two views of Churches are included in 5.10.

We are very keen to work closely with you on these matters please do not hesitate to get in touch with me and with the local parishes.

Archdeacon of Hampstead