

LADDER COMMUNITY SAFETY PARTNERSHIP

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About the LCSP

The Ladder Community Safety Partnership (LCSP) is an umbrella organisation, representing numerous Residents' Associations, Neighbourhood Watches, and individual members, and aims to communicate the views and concerns of local residents in the Ladder and Green Lanes area of Haringey, as expressed in our regular monthly meetings and updates.

The LCSP has a very large membership and it would obviously be impossible to reflect the views of every single one of our members. However, the following submission is carefully based upon comments made by our members

- a. At the monthly LCSP meetings on 12th February and 12th March 2015.
- b. Via individual communications to the LCSP committee members over the past weeks.

About this response

The following response from the LCSP focuses on particular aspects of the Development Management Policies (Preferred Options) Document and the Site Allocations (Preferred Options) Document, which are of particular relevance and importance to residents who live in Haringay Ward and the surrounding area.

Development Management Policies

Our responses to the new proposals are based on two straight forward principles drawn from Haringey's own long established policies.

- 1) *'That future development in the borough will not worsen the quality of life for those living and working in Haringey'* (Saved UDP, UD3).
- 2) That none of the borough's existing policies which are designed to protect residential amenity should be in any way weakened or compromised, and, where possible, should be strengthened and enhanced.

In this context, we draw attention to the following concerns:

- a. **Development Design:** The proposed policies in this section (p5-28) generally offer helpful detail and clarification of Saved UDP3, 7, 10, 11 regarding design, privacy, tall buildings etc. However, our confidence in these policies is undermined by statements like the following: *'whilst not having a "level site" may seem to make it more difficult to build, changes in levels can be exploited to squeeze in more accommodation with less impact on neighbours ...'* (2.10, p8). This sounds more like a sales pitch by an ambitious developer rather than the considered policy of a local authority. We do not believe that squeezing in accommodation should be a criterion put forward by a responsible Council as part of its planning policy and we are concerned that this frame of mind will undermine the need for a robust and objective examination of developers' proposals in the future.
- b. **Housing:** While the need for more housing is self-evident, it is very important that this should not be achieved via the over-development of sites and the cramming in of small, high-density units. Overcrowded and dense development does not foster community cohesion and well-being, but rather tends to lead to anti-social behaviour and crime, or, at the very least, to serious loss of amenity for both new and existing residents.

There is a real danger that policies are being driven by attempts to meet (unrealistic) targets. In the Site Allocations Document it is stated that the revised London Plan has *"set a challenging housing target for Haringey [it] was 820 units per annum [but] from 2015 it will be 1,502 new units per annum. Thus over the Plan period 2011-2026, the housing target for the borough is 19,802 net additional dwellings"* (introduction, p8). However, in the Housing section of the Development Management policies, which we are discussing here, the target has become a

requirement, driving all before it: “*Haringey’s Local Plan Strategic Policies require the delivery of a minimum of 19,800 new homes on previously developed land within the Borough by 2026*” (Introduction, p29).

LCSP members are already very familiar with the problems caused by over development and densely occupied properties as a result of the excessive number of conversions, sub-divisions and HMOs in Ladder roads. It would be a great pity to replicate any of these problems in any new developments. In this context we welcome the proposed Family Housing Protection Zone (p38-40), but hope that it will prove more effective than the current Ladder Restricted Conversion Area (UDP, HSG11c) which has all too often failed to prevent the conversion of family houses into smaller units.

- c. **Employment and the Economy:** The LCSP strongly supports town centre policies which prioritise the retention of A1 uses at ground floor level. We are therefore disappointed to see that existing UDP policies have been weakened by the omission of two key provisions – “*that the change of use [from A1] does not result in a significant break, normally 3 frontages, in the continuity of retail frontage and, individually or cumulatively the proposed use does not have an adverse effect on the vitality, viability or predominately retail function of the centre*” (UDP / TCR 3b/c). We believe that the removal of these criteria will weaken the case for the retention of shops in our town centres and we therefore urge their re-instatement.

Having played a leading role, over many years, in efforts to limit the number of betting shops in Green Lanes, the LCSP very much welcomes any proposal which may help to prevent clustering and over-supply. Our only observation would be that the suggested 5% threshold may be a double-edged sword. Firstly it still allows for large numbers of betting shops in a small area, e.g. in Green Lanes there are 165 primary frontages (Appendix C, p102) making as many as 8 betting shops automatically permissible. Sadly, Green Lanes already has 8, so it will not reduce their number, although it should, at least, prevent any more. However, there are other town centres in the borough where the policy may, unintentionally, facilitate a growth in numbers to the maximum level. It would also be helpful to know whether AGCs (Adult Gaming Centres) are included in the 5% figure.

The LCSP also welcomes the emergence of policies, which did not appear in the UDP, limiting the provision of Hot Food Takeaways to promote healthy communities and tackle obesity (DM56 p88-9) and protecting public houses from unnecessary re-development or cynical change of use (DM60).

- d. **Missing Policies:**

Enforcement: We note that there is no section in the text relating to Enforcement, such as that which appeared in the original UDP of July 2006. This seems to our members to be a very serious omission, given that none of the proposed Development Management Policies will succeed unless properly monitored and enforced. We are particularly concerned about this because Planning Enforcement has for many years been a poorly resourced and under-staffed unit, yet it should be seen as a key element in dealing with sub-standard or unauthorised development, rogue landlords, and other problem areas.

Shisha Lounges: As noted above, the LCSP welcomes new policies which are designed to promote community well-being. We are therefore concerned that the text of this document contains no reference to Shisha Lounges and the need to ensure that all planning requirements have been met, especially when a shelter for users is at issue. We strongly urge the inclusion of a policy statement, making it clear that unauthorised development in Shisha businesses will not be tolerated.

Site Allocation Document:

Cumulative impact

We are extremely disappointed that the proposals in this document have confirmed, rather than addressed, the concerns expressed by the LCSP in our response to the first round of consultation (March 2014).

Our members' particular concern was the size of the proposed developments combined with the extent to which many were clustered together near Green Lanes, creating a worrying and negative cumulative impact on the local Harringay area. These fears have now been more fully fleshed out by the Site Allocations Document, as demonstrated by the following summary of no fewer than 11 sites, covering an area North-South from Turnpike Lane to the Arena Retail Park and surrounding roads, and West-East from Wightman Road to St. Ann's Road.

<u>Site ref.</u>	<u>Site Name</u>	<u>Location</u>	<u>Number of residential units</u>
SA21	Turnpike Lane Triangle	Between Westbury Ave, Langham Rd, T. Lane	48
SA22	N of Hornsey Rail Depot	Between New River, Railway, Hampden Rd.	70
SA30	Hawes & Curtis	Green Lanes, N8	81
SA31	Wightman Road	Jewson's, N4	60
SA32	St Ann's Hospital	St Ann's Road	456
SA33	Arena Retail Park	Green Lanes, N4	693
SA34	Arena Design Centre	Ashfield Rd, N4	140
SA35	Crusader Ind. Estate	Hermitage Rd, N4	N/A
SA36	Omega Works	Hermitage Rd, N4	66
SA37	Vale/Eade Rds	Vale/Eade/Hermitage Rds.	45
SA38	Overbury/Eade Rds.	Overbury/Eade/Tewksbury Rds.	220

The Council is therefore proposing that a total of 1879 residential units should be achieved via development of these sites. A unit, of course, may mean anything from a one-bedroom flat to a four-bedroom house, so at the most conservative of estimates it would seem more than reasonable to suggest doubling the above figure to reach a minimum of 3758 new residents in and immediately around Harringay Ward, with all of the resulting implications for infrastructure – traffic, public transport, air quality, flood risk, sewage and water supplies, medical services, schools, and so on.

In addition, the proposals would mean that the Ladder roads would be both bordered and defined by a series of new high-rise blocks. To accommodate such very large numbers of new residents, the following maximum heights are envisaged in the document: to the North, 11 storeys at Turnpike Lane; to the South, 9 storeys at the Arena Retail Park; to the West, 10 storeys at Hampden Road; and to the East 6 storeys in the various sites of the so-called Harringay Warehouse District.

It would be no exaggeration to say that these proposals will transform the local area and are the biggest changes since the construction of the Ladder roads themselves, in the closing decades of the nineteenth century. It is therefore all the more important to be absolutely sure that the whole package of development for the area is not over-ambitious in scope, size and scale, bearing in mind that Harringay is already a very densely developed and populated area.

This is, of course, clearly demonstrated by the Council's own policies which are designed, for example, to prevent the further subdivision of family housing. Indeed, we could scarcely do better than cite Policy DM22 (para 2.28, p39) of the Development Management Document, which states that "*The incremental cumulative impact of conversions over the past 20 years has resulted in unsatisfactory levels of on-street parking/congestion, increased pressure on local services, adverse changes to residential character and amenity ...*". Even allowing for some infrastructure improvements (which are, of course, by no means certain in the current economic climate), why should it be that adding nearly 4,000 new residents will not put intolerable pressure on traffic, local services and residential character and amenity?

Arena Retail Park: All of these concerns were raised in the LCSP's previous submission, with a particular focus on the Arena Retail Park (SA33) which, since the first draft, has now emerged as the second largest housing provider in the entire Site Allocations Document. This is a cause of grave concern not only for our members, but for the future well-being of the area as a whole. We repeat here the infrastructure issues raised in our previous correspondence, not least because the relevant section of the current document (p9-12) deals with them in such broad and general terms.

Infrastructure concerns noted in our previous submission, March 2014, which are even more relevant, given the increased development of the Arena site in the new proposals.

Traffic

This is an extremely busy shopping/leisure venue. Williamson Road is already so congested that staff are specially employed to deal with traffic problems. These staff have been threatened, and even assaulted, on occasions because the traffic congestion in and out of the site is so bad, especially in peak periods such as December.

Green Lanes itself is no better, and the traffic flow is further exacerbated by the no through routes for vehicles via either Hermitage Road or the Gardens roads. Green Lanes cannot cope with any more traffic in its present configuration. Any new development will undoubtedly bring greater traffic and hence further stress to the area.

This has been acknowledged by the Council itself in the Local Plan: Strategic Policies 2013-26, which states '*movement in and around the centre is an issue because of the high level of vehicles along Green Lanes*' (p107).

Air Quality

As noted in the Local Plan, '*the whole borough is an Air Quality Management Area (AQMA), and has particularly high levels of pollution from nitrogen dioxide and particulate matter. The dominant source is .. road transport ..*' (p138).

It is well known, via a variety of public health indices, that this problem is particularly relevant to Green Lanes, and the residents who already live both in the flats above commercial premises and in the adjacent Ladder and Gardens roads. Any major developments, on the proposed scale can only lead to a further deterioration of air quality levels of which, as you will be aware, Haringey Borough is already currently 88% higher than European approved levels for air quality. The monitor in Priory Park lowers this average: measurements in the east of the borough are often as high or higher than central London. A modelled map in Haringey's Air Quality Action Plan 2010-2018 shows that throughout Haringay Ward the *annual* mean NO₂ ug/m³ does not drop below 44 (40 is the EC annual limit). Haringay ward is by far the largest residential area in the borough with such a high NO₂ *away* from main roads. A PM10 map shows Green Lanes/High Road to be worse than any roads except Seven Sisters and Parts of Tottenham High Road.

Flood Risk

This is obviously a very topical concern. The site is in a Critical Drainage Area, which is self-evident given that the corner of Green Lanes and Williamson Road is already prone to sizable areas of water accumulation owing to poor drainage. The effects of a proposed underground car park are potentially very alarming with an unknown impact on the water table over the surrounding area.

High Density Housing

The site is not suitable for high density or high rise buildings. To suggest that up to 8 storeys could be achieved without any negative impact on existing amenity is frankly ludicrous. This is not an area of high rise development and the Local Plan makes it clear that it is not acceptable to put up '*tall and large buildings ... which are substantially taller than their neighbours*', and that '*Haringey is characterised by predominately low-rise (2-3 storey) residential suburban development across the borough, and 3-4 store developments in town centres*' (p112).

We all agree with that view. There are no 8 storey buildings in the immediate area in Haringey,

where the preponderant structures are late Victorian terraces.

Open Space

It is disgraceful to imply that because Finsbury Park is nearby, there is no need to be concerned about private open space in proposed future development on the site. This is a particularly cynical justification for a densely packed and unattractive development.

Public Transport

The buses along Green Lanes are already extremely busy and it is not always possible even to get on the very regular route 29 at certain times. Similarly tubes at Manor House and trains at Harringay are often full to bursting, with the concept of a 'rush hour' seeming to apply for ever longer periods of the day. The nearby large residential development adjacent to Manor House (LB Hackney) which is underway will of course add to these problems. Saturdays and particularly Sundays are also extremely busy for the transport system in the Green Lanes area, with buses regularly caught up in nose-to-tail congestion between the railway bridge and the St Ann's junction.

Medical Services

GP surgeries in the area are already seriously overstretched. It is extremely difficult to get an appointment to see a doctor, which in turn has contributed to overcrowding and lengthy waits at A & E departments. Only this month (February 2014) problems emerged at one of our local hospitals (N. Middlesex) with ambulances stacking up outside A & E before they could gain access. NHS England has revealed that the number of emergency vehicles waiting for longer than 30 minutes at the N. Middlesex has increased dramatically from an average of 12/week (Dec 2012-Feb 2013) to an average of 88/week (Dec 2013-Feb 2014). There have also been proposals to downgrade facilities at our nearest major hospital, The Whittington, and of course St Ann's is not a general hospital and two-thirds of the site will be devoted to housing, as noted in these proposals (S1).

Schools

It is well-known that there is already a shortage of places for children under 8 years old throughout the area. Locally, South Harringay Junior School (close to the Arena site) is having to extend to 3 form entry for Year 3 from September 2014, and there is a similar pressure on the Infants School to expand to cope with ever-increasing numbers. If this is the situation already, the problems which will arise as a result of the proposed developments can readily be imagined. Local schools cannot continue to expand on demand.

In the context of these concerns, the views of residents expressed via the LCSP seems to have been totally ignored. For example:

- Concern was expressed about the over-development of the site. The reply is to increase the number of residential units and create new retail frontages/town centre uses along Green Lanes towards Hermitage Road.
- Concern was expressed about the inappropriate proposal of "heights up to 8 storeys". The reply is to increase the height to 9 storeys.
- Concern was expressed about the existing very heavy levels of traffic in and around Green Lanes. The reply is to suggest that, following a "comprehensive transport assessment", "traffic impacts on Green Lanes from this site should be reduced through this development". Are we seriously meant to believe that some 1400 new residents on site and a new primary commercial frontage will reduce traffic impact? This sort of assertion makes it very difficult to take seriously any of the other claims regarding noise pollution and air quality, made about the site in the Development Guidelines (p95).

Conclusion

Our conclusion on the Site Allocation's Proposals therefore remains the same as before, only strengthened by the Council's unwillingness to recognise the views of residents who live in the Harringay area and have first-hand experience. It is the sheer scale and cumulative impact of so many proposals in a

small and already over-crowded corner of the borough, which remains our over-riding concern, particularly when substantial funding for much-needed new and improved infrastructure facilities is so unlikely.

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Chair
On Behalf of the LCSP