

Dear Madam/Sir

The following is Page Green Residents Association's response to Haringey's Local Plan Consultation.

*The Page Green Residents' Association's catchment area in N15 covers: Ashmount, Earlsmead, Pembroke, Colless, Townsend, Wakefield Roads; Page Green Terrace; and Stephenson House. There are approximately 500 people living in our area.*

Regarding Haringey's Alterations to Strategic Policies 2011-2026:

- **We are opposed to the increase from 10,000 to 20,000 new homes being built by 2026 with a focus on regeneration areas in Tottenham and Wood Green.** The current increase in population in Tottenham is already unmanageable, i.e., schools are over subscribed; transport is grossly overcrowded; primary health care provision is so insufficient that patients are having to use A & E, etc.; It is irresponsible to the people of Tottenham to increase the population to such an extent with no corresponding infrastructure in place. Promises from the mayor to do something when it gets bad enough, is not good enough. Tottenham is already far more densely populated than the west of Haringey Borough. Why would Haringey Council agree to make this disparity even worse and then even worse again by adding an additional 10,000 homes? The London Plan does not that dictate that these additional 10,000 homes have to be located in Tottenham rather than the rest of the borough. This is not just as it will lead to an unfair burden on the infrastructure and to social stress and unrest. We believe Tottenham lives matter.

On Page 24, (10.2.4) of the SA of the Site Allocations DPD, it states, 'Over the plan period (2011-2026) this creates an overall target of 19,802 net additional dwellings in Haringey. The Tottenham AAP will accommodate 10,000 of these dwellings and so there is a need to deliver 9,802 dwellings in the rest of the borough. This statement contradicts the intention now to concentrate all this development in Tottenham and Wood Green.

- **We therefore support Option 2 under strategic policy options in the Non-technical Summary of the Interim SA Reports: "Option 2 - 'Dispersed growth with each ward taking a roughly equal share of the additional housing (i.e. the additional 682 homes per year) above and beyond the existing spatial strategy'.**
- We also support Option 2 as compared to the Council's preferred strategy Option 1 that states: 'Do not allocate sites for purely open space is on balance preferred. Priority considerations include the need to avoid any approach that would compromise the Council's

ability to meet its housing and jobs targets'. It should be obvious that with such an increase in population and so many more people living in homes without gardens, we must have more open space. Yet option 1 allows Haringey Council to do away with the very limited green space Tottenham already has. **We support Option 2 aspect that seeks to allocate sites as open space.**

- 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'**. Our residents association has already had a meeting with Emma Williamson, Head of Development Management and Planning Enforcement, regarding this important matter. She suggested to us that we put our concerns in this consultation document.

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.

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 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 the transient population and are eager to contribute to the well being of our neighbourhood.

In addition, the houses in our neighbourhood are now selling for over half a million. Most people in our area cannot afford these prices. By allowing conversions into flats, Haringey will be increasing the number of affordable housing.

**We, therefore, support Option 2: 'No restricted conversion area'**. (HMO licensing should remain. Measures to discourage

developers buying houses to let could be introduced – if only Planning would take that initiative!)

Under 'Conclusions of alternatives appraisal' (Page 10 of SA of the Strategic Policies Alterations) the section on 'Housing Conversions', appears to be confused and contradictory. It states, "A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant."

This statement seems to state that conversions are good and bad, needed and not needed, Without any choice of options given to residents in an area who are at the complete mercy of unscrupulous landlords and a non-existent Planning Enforcement.

We state from long and hard experience that HMOs should be discouraged while home ownership should be encouraged if

we want our neighbourhoods improved. **Option 2, allowing no restrictions to houses being converted into flats**, seems the only way to realistically do this. Discouraging landlords buying houses (and they can offer more money than individual families in our area) and turning them into HMOs.

Thus certain aspects of Option 2 should be swapped for their counter aspect in Option 1

Regarding SA of the DM Policies DPD

For all the above reasons regarding our support for no restrictions to conversions we are opposed to Option 1's restriction of housing conversions. Option 1 will lead to an increase of all the problems that occur when family houses are brought up by landlords to be converted into HMOs. The more HMOs that come into our neighbourhoods the more families will move out. This is already happening. As already stated above, conversion into flats will encourage home ownership and a stable community.

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%). Conversion into flats can be allowed while family homes becoming HMOs should be discouraged. Therefore, **We support Option 2 for this aspect of policy**

- Under Housing Density and Design, We are against Option 1, which states - Apply London Plan density standards, with exceptions in some circumstances. Density limits are there to protect populations, and the Tottenham population should equally be allowed that protection. Otherwise, the Council appears to be saying that as housing is needed, people in Tottenham should fulfil this need more than other London residents; our rights and needs are less precious, particularly if there is money involved. Option 1, admits, **'there are risks around access to health care and community infrastructure more generally'**. Is this such a small risk that it can be discounted? The answer is definitely 'no'. The life expectancy in Tottenham is 9 years less than the west of the borough. Is the Council condoning an increase in this discrepancy?
- The Borough has population density of 86.2 persons per hectare; well above the London average (52.0). How can the Council encourage a greater discrepancy? We therefore, **support Option 2 for this aspect of policy**
- **We oppose 23.5.5** 'Loss of family housing to Houses in Multiple Occupation (HMOs) is a key issue in Haringey. DM 23 (Houses in Multiple Occupation) seeks to restrict the conversion of housing into HMOs so that Haringey can maintain a stock of larger homes in the priority areas for families, and to reduce the risk of the larger housing stock from being completely converted. This does not completely restrict HMOs and housing conversions altogether

but it does strengthen the requirements so that HMOs that do come forward are higher quality and in more accessible locations – **where are the facts to support this argument....none if we can believe our experience?**

**As above, we support the conversion of houses into flats rather than allow them to be brought up by landlords who will create HMOs. HMOs are wrecking our neighbourhoods. Flats will add to the affordable housing stock, facilitate home ownership and encourage neighbourhood regeneration. The demography of the area is changing. Fewer people need large family homes. Anyway, letting them be brought by landlords who will turn them into HMOs will not provide homes for families.**

- **We oppose 23.14 Open space** because there are too many let out clauses such as, ‘...that development is not to lead to adverse effects on designated sites and will be protected unless the benefits of new development outweigh nature conservation or scientific interest’; ...’ ensure that development proposals do not lead to the whole or partial loss of open spaces without an assessment of the current level of provision’, etc. Who is to decide ‘the benefits’? No, there is too much wiggle room here and we believe it will be taken advantage of. There is too little Open Space already and with so many new homes without gardens, Open Spaces needs to be absolutely ring-fenced.
- In the SA of the Site Allocations DPD report, section ‘Open Space’ it states ‘Haringey’s 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments’. Section 23.14 is in contraction to this statement by allowing development on Open spaces in ‘some cases’.
- SA of the Site Allocations DPD, Open Space, page 33. We oppose Option 1, which states; Do not allocate sites for purely open space. **We support Option 2 here for the reasons stated above.** We need to create more Open Space to support additional population. Tottenham already has far less Open space than other boroughs and, supposedly Haringey has a commitment for creating more.
- SA of the Site Allocations DPD, 14,3.1 Education, states, ‘where need for additional capacity has been identified, this might be delivered in one of three ways: bulge classes (not sustainable for long term increased provision), expansions and new (free) schools as a part of major sites. We oppose the idea that ‘bulge classes’ are even considered by the Council as a possible short term solution. Would the officers in Planning or the councillors themselves even consider this an option for their children? More school places will

obviously be needed if over 30,000 or more people are moving into Tottenham. The schools need to be sorted before the housing, yet this appears to be a minor consideration. Does the Council think that the middle class families they hope to attract will move into the area if there are no new school places?

- SA of the Site Allocations DPD, page 64, Appendix IV – Open Space, states under housing, Option 2 would certainly constrain the ability to deliver on the ambitious London Plan housing targets. Significant negative effects are predicted. Our interpretation of this bold admission is that Haringey Council has every intention of building houses on Open Space. We strongly oppose the use of the limited space we have for housing development. Again, **we oppose Option 1 here and support Option 2 which would not allow development on Open Space.**

#### Sustainability Appraisal (SA) of four emerging plans

- **We support Option 2** - Dispersed growth with each ward taking a roughly equal share of the additional housing (i.e. the additional 682 homes per year) above and beyond the existing spatial strategy. This would promote equality of the burden and mitigate wiping out whole communities. The supposed negative effects of Option 2 are not based on facts but instead on spurious opinions.

Option 3, promotes development around all town centres and Crossrail stations. But the west part of the borough has already been excused from development and Crossrail hasn't been approved yet.

- We wonder if Option 1 has been chosen because of its attraction to developers, who are most interested in housing near transport links rather than unused land that is a ten-minute walk away. But what is better for the people of Tottenham who risk having their homes and communities destroyed with no affordable housing to replace them?

#### Sustainability Appraisal (SA) of the Tottenham AAP

- 17.11 Town centres: This section leaves out West Green Road N15, as a significant bustling business and retail centre, which is in dire need of an improved public realm and the creation of attractive, functional public spaces. The shops along Broad Lane leading to the High Road also need support and regeneration. The District Centres of Seven Sisters need to be protected and improved, particularly in light of retail developments in Tottenham Hale. Otherwise, Haringey Council could produce a further downward slide to the District Centres of Seven Sisters as it did when it developed the West Green Shopping Centre. If Seven Sisters is the gateway to Tottenham, Haringey shouldn't be contributing to its decline.

#### Neighbourhood Areas and Opportunity Sits

- SSE: Apex House & Seacole Court. We object to the current development plans as set out by Grainger plc. The Grainger plan for a 21 storey tower building:
  - Breaks urban design rules regarding mass & scale compared to surrounding buildings.
  - Breaks Haringey Council's draft plan for only 95 units on this site.
  - Breaks European Law on blocking light and impinging privacy – Grainger's solution to this is to knock down the neighbouring council building, Seacole Court! This demolition is not part of Haringey's original plan. Furthermore, the tower would block all of Stonebridge Estate's morning light up till 1pm. This is illegal according to European Law.
  - Breaks London Plan Density Matrix – too many people per room.
  - Breaks best practice regarding diversity and social cohesion. The children's play area will be on the first floor, and therefore, will not be available to neighbour children. Tenants in affordable flats will have separate entrance to private tenants – or 'poor doors' as they have come to be know. So it creates gaited housing with no social amenities for the community around it.
  - Breaks Haringey's commitment to Social Housing – there is zero SH.
  - Breaks planning precedents regarding the height of buildings on the High Road and sets new & hugely worrying ones. The current Grainger Plan will mean that this tower is 400% higher than any other building in the vicinity. The current plan's 'artist impressions' are, what can only be, deliberate distortions of how the 21-storey building will fit into the surroundings. We have been able to correct these impressions with our own drawings.



Grainger's artist's impression along Seven Sisters Road



Our adjusted & realistic impression using correct calculation

- **We propose that this site have a building no higher than 6 or 7 floors.**



- SS5 Wards Corner and Suffield Road.
  - We support the Existing Permission 2 – HGY/2011/1275 as it keeps the façade of these valuable Edwardian Buildings, which make this site truly distinctive rather than a concrete and glass structure that you could find any where in Europe. These buildings are a valuable asset and part of Tottenham's history. It would be a real shame to demolish them. We want Haringey to find a developer who can restore and renovate these fine buildings, whilst helping to maintain their current and lively and unique Latin American community.