

FARA formal reply to council for Draft Local Plan 2025

Fountain Area Residents' Association (FARA) was established in 2007 and has played a key role creating positive change in the area, acting on behalf of residents for an area covering 800 homes in the following streets: Northern end of Avenue Road, Braemar Road, Birstall Road, Elmar Road, Greenfield Road, Kirkton Road, Roslyn Road, Seaford Road, and Southey Road.

FARA works to encourage sustainability, safety, and a sense of community in the area and has worked in partnership with Haringey Council, Groundwork, and Sustrans to develop and improve green spaces and active travel infrastructure.

We have a number of proposals for continued improvement of our area, most of which are contained in the attached document "FARA_Community_Plan_Placemaking.pdf" which we would like to propose for incorporation in the local plan.

Policy SSN1: Seven Sisters and SouthTottenham Neighbourhood

This policy states: ***D: The rich built heritage of the neighbourhood should be preserved, enhanced and celebrated. To achieve this, proposals should: (1) strengthen the sense of enclosure along its key corridors and protect and enhance the views and vistas of townscapes and landmarks offered throughout the neighbourhood. (2) conserve and enhance the homogenous and coherent character of its urban terraces***

Also, under "Character and heritage" 9.27 The Council will work positively with landowners and applicants to sustain and enhance the special character of the Clyde Circus Conservation Area to remove its Heritage at Risk status.

FARA believes the streets within our area are excellent examples of the homogenous and coherent character of urban terraces. We believe our area should be designated a conservation area - this proposal has been warmly welcomed by residents faced with increasingly egregious breaches of planning permission in our area

FARA understands the rationale behind the following proposal but has significant concerns:

G. To tackle overcrowding and provide for additional habitable accommodation for large families, the Council will support proposals for house extensions in South Tottenham in line with the House Extensions in

South Tottenham Supplementary Planning Document and subsequent design codes the Council brings forward relating to such development.

Supporting text

House Extensions in South Tottenham

9.31...the Council will review the existing SPD to ensure that it is still fit for purpose including the three standard types of house extension and the boundary which the SPD relates to.

Existing extensions in South Tottenham are in many cases of low quality, and very much have an adverse affect on the character of the area - the existing SPD is clearly not fit for purpose and needs to be rigorously enforced. We would particularly like to emphasis that any such supplementary guidance should apply ONLY to South Tottenham, and there must not be planning creep of this policy, such that residents in other parts of the borough create extensions to the SPD standard and this should be explicitly stated in the Local Plan

Placemaking Strategies + Site Allocations

The area covered by FARA is almost completely ignored in the Draft Local Plan. We suggest it should be enhanced/protected in line with policy SSN1 D and Character and Heritage 9.27

Flood mitigation, climate resilience, biodiversity in SSN

Throughout the draft plan there has been no indication of site specific measures to specifically create rain gardens or other more substantive flood relief measures, biodiversity enhancement, or opportunities to address urban heating.

Strategy 9.61 states: *Explore opportunities to daylight sections of the Moselle Brook to enhance biodiversity, climate resilience, and public realm quality*

FARA strongly believes the same aims should be adopted with regard to Stonebridge Brook where it runs under the neighbouring area of Chestnuts Park, Falmer Road, Newsam Avenue, and thence under a significant area of SSN which is at high risk of surface water flooding.

All opportunities for flood mitigation through use of the extensive Victorian culverting of Stonebridge Brook should be investigated, including the potential for opening up the culvert to create stormwater drains, and locating specialised SUDs along the course of the brook.

We understand the proposed flood relief scheme for Chestnuts Park is currently on hold, but this should be re-instigated, working with Friends of Chestnuts Parks to devise a compromise solution, with additional SUDs in the North East corner of the park where woodland is proposed, as a key measure to prevent extensive flooding downstream in SSN. This may not necessarily involve

de-culverting in the park.

We would also like to highlight the extensive paved area of Newsam avenue as an ideal location for a large SUDs project -it's a key area for surface water flood risk, possibly draining into the Stonebridge culvert, lying as it does directly above the course of the brook. Other locations should also be investigated such as Lydford Green, at the Eastern end of Lydford Road/Western end of Culvert Road.

Several opportunities exist within SSN for greater density tree planting to alleviate the heat island effect, including the under-used grassed area between Lomond Close and Brunswick Road, and the under-used green area within Ida Road estate.

Active travel routes in SSN

We note that in SS PFA6: West Green Road (east), Strategy 9.62 states - *Enhance Clyde Road as a key east-west active travel route.*

FARA has for many years proposed an East-West route linking Chestnuts Park to Brunswick Park, and thence to Markfield Park and the river Lea, to give residents from a large constituency in the east of the borough an active travel route to access the vast green space of the River Lea and its marshes running from the Olympic Park in the South, to Cheshunt and beyond in the North. The route is indicated in the attached document

FARA_Community_Plan_Placemaking.pdf Starting at Chestnuts Park, the route would go via Falmer Road, Newsam Avenue, Roslyn Road, to Brunswick Park, then via Birstall Road, Seven Sisters Road, and Stonebridge Road to the High Road, then via Crowland Road to Markfield Park

Policy SSN1: Seven Sisters and South Tottenham Neighbourhood

Whilst recognising the Council's desire to develop and enhance the Seven Sisters and West Green Road District Centre and West Green Road East, there should be much more commitment to supporting and enhancing the whole of West Green Road. It is an existing and popular high street that needs support to maintain the character, diversity and independent nature of its businesses.

Haringey Draft Local Plan

Part 3: Borough-Wide Policies

Chapter 25: Housing

Policy H12: Residential Conversions, Houses in Multiple Occupation, and Hostels

Houses in Multiple Occupation

Proposals for the conversion of homes to HMOs where planning permission is requiredwill only be permitted where:

C (3) Fewer than 10% of dwellings on the street have a property licence as a HMO

We consider that the ceiling of HMOs in a street should be reduced to 5% in order to meet the requirements of D (4) i.e.

The development will be managed and maintained so as not to give rise to unacceptable impacts on the amenities of existing residents ...etc

The rapid expansion of the gig economy and of home food delivery has significantly altered the nature of many HMOs. This has a negative impact on residential streets due to the increased number of delivery vehicles, mostly scooters occupying the street.

It has also increasingly altered the quiet, family-based nature of residential streets.

CLIMATE RESILIENCE

While there are things included in the Local Plan which are welcome, there are also important items which are lacking in terms of planning for climate resilience over the coming years.

Weather patterns in London are already changing. Already we are having hotter, drier summers and wetter winters with more intense storms and sudden downpours than we did in the past. In the past few years West Green Road has been flooded twice, and many areas in Haringey are also vulnerable to surface flooding, as shown in Chapter 21, Climate Resilience and Adaption of the Borough Wide policies document.

FOOD GROWING

Tottenham is one of the most impoverished areas in the country and many residents are and will be impacted by the cost of living crisis, driven by increasing energy and food prices.

In Policy G7 of the Borough Wide Policies part of the plan, it states that new developments and meanwhile sites should include provision for food growing spaces. This is welcome but there are already many existing places in Haringey which potentially could also be sites for community food growing.

While there are already several community orchards, including those on Avenue Road, Lordship Rec and Downhills Park, there are many, many potential spaces across Haringey for more community food growing groups and sites.

While it may not be practical to grow fruit trees on streets due to fruit drop, wherever trees are planted in green spaces or parks, fruit trees should be considered as potential local food sources for residents. There are many opportunities across Haringey for the construction of new planting beds and parklets on currently underused sites. As much as possible, potential perennial food bushes and trees should be considered and clearly labelled, so that the local community is able to learn about, and participate in, food growing and production.

BIODIVERSITY NET GAIN

We are facing inevitable changes to our climate but also a collapse in biodiversity, insect and wildlife populations. Policy G5: Biodiversity and Biodiversity Net Gain recognises this but increasing biodiversity should be embedded in all council decision making processes.

All planning decisions for both new buildings and the retrofit of existing buildings should maximise the inclusion of new biodiverse green space so that nature corridors and networks across Haringey and neighbouring boroughs can be linked.

TREES

In Policy G6: Trees, there is welcome recognition of the importance of retention of existing trees. However, it is not clear how Haringey Council will monitor or enforce these regulations.

Mature trees should be regarded as critical infrastructure as they reduce pollution, absorb CO₂, reduce flood water, reduce the increasing Heat Island Effect and provide habitat for wildlife, insects and birds. The existing mature trees that we already have are one of the most important resources available to us in our local urban landscape and all planning decisions should reflect their importance in helping to maintain a stable environment. Existing mature trees are fundamental assets for both Policy CR 4: Managing and Reducing Flood Risk and Policy CR 2: supporting Urban Cooling, and should be recognised as such.

As Policy G6: Trees states, planning applications for new building use Standard BS 5837 (2012) for the protection of trees on construction sites, the adherence to which is integral to the granting of the planning application. At the Brunel Walk site in South Tottenham for several months the contractors did not follow the tree protection plan listed in the planning application. When this was highlighted by local residents some of the measures were then put in place, but

several trees were lost that should have been retained in the original planning application. At the same site, one of the highest amenity value trees, which was protected in the planning application, was removed for crane access, something which should have been planned for well in advance, so that the tree could be retained as stated in the application.

Section D of G6: Trees states that the removal of TPO'd trees would be resisted by the council, yet the unresolved issue of the felled trees at the Fountain Pub on West Green Road, which were under TPO's, is another example of a situation where a council policy has been ignored and unenforced.

Haringey needs to have a robust policy of protecting mature trees as critical infrastructure in its Local Plan. It also needs to include monitoring and enforcement of Tree Protection Plans in planning applications, so that contractors know that they have to do everything they can to protect mature trees on their sites. This is not happening at the moment.

NEW DEVELOPMENTS

In regards to urban planning, all new buildings or street works should:

- Be highly insulated and include solar panels to help reduce energy consumption.
- All prioritise biodiverse green space and potential for localised food production.
- Include the inclusion of Sustainable Urban Drainage Systems, to reduce water street runoff and surface flooding.
- Have increased size of tree pits to ensure the health of street trees and trees on estates.
- Wherever possible utilise permeable surfacing to increase water soil penetration and reduce surface flooding.

SEVEN SISTERS AND SOUTH TOTTENHAM NEIGHBOURHOOD

- In the Seven Sisters District Centre SS PFA1, Brunswick Park is a potential site for building raised planting beds for community food growing. There is a vibrant community that use this park but there are also issues with anti social behaviour. The more that the local community use this park for social and nature based activities, the less likely it is to be used for drug use which is common in the summer. The potential space for raised beds in the park could provide herb gardens for local people to use.
- There are no public toilet facilities in Seven Sisters. This means that green space and parks are often used as toilets in this area. The provision of well maintained toilet facilities would reduce this abuse of public space.

- The Seven Sisters entrance to the tube station is depressing and unwelcoming. It is not a good introduction to what is a culturally rich and vibrant area. The improvements at South Tottenham overground station is a good example of what could be achieved to help create a more positive environment.
- The Brunswick Park entrance to the tube station should be open on a regular basis. It would greatly reduce the crowded flow from the current entrance on Seven Sisters Road.
- South Tottenham has a rich history, which if highlighted could help local people feel more connected to the area. Haringey Council could do much through signage to both improve wayfaring through the borough and a sense of connection through understanding more of the history of the neighbourhood in which we live.

Seven Sisters Road tube station entrance

The Fountain Area Residents Association has been campaigning for improvements to the Seven Sisters Road entrance to the underground and overground lines for several years. Following an initial meeting with representatives of the various bodies involved including TFL and the local Haringey Council we have been disappointed that only a few minor improvements have been made. We are very keen that a positive decision is made to install a lift to the overground as we had expected to happen almost two years ago. We are particularly concerned at the state of the current bike rack which our experienced cyclist members consider is not fit for purpose but it seems from what we have been told that the only way a new bike storage area can be installed is if the current portacabin which is used for staff welfare is relocated. Given that the year in which Haringey will be the Borough of Culture in 2027 is imminent it seems vital to our group that these improvements are made to reflect a positive image at this major gateway to the borough. There is an enormous footfall at Seven Sisters Road entrance which includes the thousands of people who use the station to travel to the Tottenham Hotspur Stadium for sporting and cultural events.

The CSI Cycle Route

Our group also wishes to highlight the problems with the cycle route in the area surrounding the High Road entrance/ exit to the tube on the High Road between West Green Road and Seven Sisters Road. This is an extremely busy area for pedestrians who are both exiting and entering the underground and waiting for buses at the bus stop located at the entrance to the tube. It is not an appropriate area to operate a bike lane as, unlike the area to the north which has room to have a separate and delineated areas for pedestrians and cyclists, there is too much movement of pedestrians to make this safe for either cyclists

or pedestrians outside. Similarly, whilst the tube. The bike route continues towards Stamford Hill in a well delineated way but as one approaches Stonebridge Road and the railway bridge it becomes a complete free for all with no attempt to indicate where bikes can be and where pedestrians can walk safely. Pedestrians are made to feel very anxious and are having to constantly look over their

Seven Sisters/ West Green Road District Centre

9.21 To complement the existing strong convenience retail offer and support a more vibrant town centre, the Council will seek to secure a greater range uses, including comparison retailer, culture, leisure, and evening and night-time economy uses

9.23 Development within the District Centre **should** >> replace with MUST allow for the retention of existing independent businesses while providing additional space to attract new independent businesses. Proposals for refreshing and restoring the shopping frontages are supported, as is retention of the generally small floorplate shops.

The word 'should' needs to be replaced with 'must'.

We need to be very open and aware that these processes of 'development' mean that Landlords can simply raise their rents and benefit from the massive investment coming into the area, and contribute little of nothing.

The businesses that have been serving the community for many many years, in often difficult and substandard situations must be acknowledged and supported. The council can implement specific conditions such as rent restrictions as well as prevent them being changed to residential use.

High streets are already extremely embattled by Internet companies that do not pay high street rents or business rates. So this needs to be acknowledged.