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From: Fiona English
Sent: 02 March 2016 17:32
To: LDF
Subject: Haringey Local Plan Representation

Dear Planners

We are writing as a residents of Tottenham to formally object to the Haringey Local Plan.

There has been a significant lack of consultation in this final step of the process. In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is little evidence of community participation being encouraged or promoted by the Local Authority in this final round of consultation apart from the absolute bare minimum. The main means of consultation were:

- Documents posted on the Council website
- Two hour sessions for people to attend at local libraries.

This is a formal process involving technical and complex documents which are likely to be challenging for the layperson, that is, if they actually know that they exist and where to find them. There were no public meetings called by Haringey to explain these plans even though the consultation ran for several weeks. The Council's borough wide magazine Haringey People – which goes to households directly – did not include one word or reference to this consultation – <http://www.haringey.gov.uk/.../haringey.../haringey-people-archi ve> . This would have been the most effective method for directly communicating with residents.

Consultation sessions in the public libraries were poorly promoted and publicised, running at times most people could not make, even if they were aware of the sessions. Given these circumstances, it would not be surprising if there was not a large response to this consultation and local people should not be blamed for lack of interest or engagement when it is likely that they were not even aware of the plans under consideration.

Haringey Council has been criticised in the Supreme Court regarding consultation. Their judgement set out conditions for fair consultation whereby, amongst the four criteria proposed, it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' We are not convinced that this condition has been met in relation to consultation on the Local Plan.

It appears that the single dimension of the Local Plan is that it depends on private property development – there appears to be no alternative approach on offer. This is high risk and runs counter to the 'soundness' criterion of flexibility and deliverability. There are many alternatives to private sector development, including working with community land trusts, building higher on existing buildings or refurbishment. None of these are mentioned as alternative options for consideration. Instead this plan is predicated on

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demolition of estates, including Broadwater Farm and Northumberland Park, where many people will be at risk of losing their homes and their security.

The local authority is also planning to enter into a joint venture with a private development company in which the Council will hand over two large council estates and many other properties. It is evident from recent news that the economy is fragile and any downturn could have a serious impact on the viability of these plans which appear predicated solely on a strong and rising property market. We consider it irresponsible for the local authority to invest all its efforts in one single approach which could have a devastating impact on tenants living on estates, and families waiting for housing.

With regard to the design of some of the proposed buildings (e.g. on the Apex House site), we are concerned that they will not fit with the general architectural tradition of Tottenham - namely low to medium-rise properties which house a rich social mix of people in established communities. The plan to build a number of high-rise buildings, some 20 storeys or more is unlikely to be compatible with the existing architectural mix. The argument put forward in the local plan is that these high rise buildings will support the development of "mixed communities" in Tottenham. This is a spurious claim as well as misleading. Tottenham is already a hugely mixed community with N15 and N17 reputed to be the most diverse postcodes in Europe. The community is mixed by race, age, class and employment. There are people from all walks of life living alongside each other. Council estates are similarly mixed with leaseholders, council tenants, private sector tenants, and where there are houses, freeholders. Council estate residents are located firmly in our communities. Demolition in favour of high rise towers is likely to result in the break-up of these communities and the development of more single or limited mix of tenure communities unsuited to families and/or people on low incomes will not solve housing need. What's more there seems to be no detailed plans about how residents (whether council or otherwise) will be rehoused, where they will be rehoused and whether they will be rehoused under the same terms and conditions as before.

In the Evening Standard Comment section, Tuesday 29th February, they argue that 'Housing needs a more imaginative approach' to high-rise. "[I]t is simply not true that for central London the best options are skyscrapers or outward expansion. We are far less densely populated than, for instance, Paris, where people live in housing that is concentrated without being intimidatingly tall. It is possible to envisage far more medium-rise developments that we have at present - four to eight or nine storeys, say - which would accommodate far more people without altering the skyline. The mansion blocks of Marylebone, for instance, are high-density

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but aesthetically pleasing and popular with residents; the same is true of the Peabody and Guinness estates, which are medium-rise. It is certainly true that how we build is a critical aspect of our ability to meet the housing crisis but [high rise is] not the best answer." The same argument could be made for Tottenham.

The Local Plan is, at best, vague on what will happen to the existing communities who need housing. Paragraph 3.21.18 of the Alterations to Strategic Policies, Pre-Submission version January 2016, states that the council "aim to ensure an adequate mix of dwellings is provided". There is no detail as to how this will be achieved especially with housing for families. The proposed developments are largely high density flats, most likely one and two bedrooms. These will not cater for local families and it is likely that current residents living in either private sector rented, temporary or threatened council homes will be left out. The Council can claim its plans will meet housing need. But this plan does not meet the needs of people in housing need who live here now.

At the very least the council must ensure that every new development has a large proportion - at least 40% and preferably 60% truly affordable housing available to local people and key workers such as nurses, teachers, community officers, social workers, cleaners, firefighters, paramedics etc. That is affordable to the people who make our community and London itself tick.

Fiona English and Mark Ellerby
2nd March 2016

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