

Haringey Council's Local Plan Consultation: Response by Broadwater Farm Residents' Association

29/02/2016

Introduction

We write our reply to Haringey Council's Local Plan Consultation mainly in reference to the *Sites Allocation DPD Pre-Submission Version* dated January 2016. Haringey Council's Site Allocation 62 is the Broadwater Farm Area. This area includes Broadwater Farm estate with all its marvellous community facilities, and also Somerset Close, Lido Square, Moira Close and the houses along Lordship Lane to the north.



The proposed zone is indicated by a red line on a map (see right) taken from the above document. This proposal, if adopted, would mean that developers could draw up plans to demolish housing on the site and provide new housing, whether this housing was provided by a Housing Association or was fully private sector housing.

The residents and the Residents' Association have worked with the Council to dramatically improve the estate over the last 30 years. It now has great facilities, including concierges, play areas, a health centre, landscaping and schools. In the last 6 years a range of refurbishments and repairs have been made - yet bizarrely it has now been put on a list of Council estates facing 'redevelopment'. We say it is the Council's duty as the landlord to finish off all the works started.

This proposal which facilitates demolition and re-building will cause massive stress to all concerned, displacement and disruption for years as well as blight and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities. Instead the Council must work with the community to protect, support and improve all the existing homes, estates, facilities and communities in the area. The proposal is unsound in planning terms as it is very inappropriate compared to the alternative of repair and refurbishment of the estate rather than demolition. Repair and refurbishment would not require a site allocation in this plan.

Broadwater Farm

Broadwater Farm Estate was commenced in 1967 on the site of the allotments by Lordship Recreation Ground. It was a massive development of high density Council housing of initially 1063 flats for housing 3000-4000 people. Due to some early problems with the estate, such as leaking roofs, residents banded together and convinced the Council to carry out works on the buildings. By 1981 a process of refurbishment had started, but progress was slow. Residents created a very active Youth Association and a Residents' Association.

From the mid-1980s the Council consulted the residents about a new program of needed works and residents identified the improvements they wanted with the Council agreeing to implement them and finding the funds to do so. The community-led regeneration of the estate attracted over £40m of resources and has been a huge success. All of the tenants' recommended solutions were carried out by the Council. Improvements included concierges for all blocks, play areas, landscaping, workshops for rent, a health centre, a community centre, a new school campus, bus route through the estate, and more.

It is now one of the most well-served Council housing estates in the UK and regularly attracts visitors from around the world who wish to see this great example of successful community-led regeneration. All these facilities are at risk of demolition if SA62 is approved as a site allocation. So is all the housing, not just on Broadwater Farm but also the excellent housing on Somerset Close, Lido Square and Moira Close. This includes special provision of housing for people with disabilities. Residents of these areas have expressed great concern about the possible demolition of their homes.

Broadwater Farm Residents' Association

The current Broadwater Farm Residents' Association was established in 1987, originating from the Broadwater Farm Youth Association. It was established to look at the issues of lack of representation and deprivation on the estate as well as to raise community spirit. It has held regular meetings with councillors and council officials over the years to achieve these goals.

The current committee was elected at an Annual General Meeting in September 2015. We hold regular committee meetings. We continue to organise events for local residents. In 2015, for example, we organised two Open Days where residents could come and meet each other, enjoy refreshments and discuss any problems or suggestions they had about their estate. We have also taken up various issues, including issues with repairs, estate facilities, general maintenance and estate improvements with Homes for Haringey and Haringey Council.

SA62: Proposal to 'Improve Stock'-What Demolition Would Mean

As the Site Allocations document notes:

'This site is listed as part of the Council's initial estate renewal programme in Policy SP2. This policy also seeks to ensure no net loss of existing affordable housing floorspace in development; and ensure that affordable housing units are designed to a high quality and are fully integrated within schemes.'¹

The possibility of the demolition of council housing on the Broadwater Farm site has been broached in meetings between members of the Broadwater Farm Residents Association Committee and Steve Kelly of the Planning Department on 18/02/2015 and 16/03/2015 and by members of our Association and Matthew Pattison of the Planning Department on 09/03/2015 at the West Green and Bruce Grove Area Forum. At both meetings Mr Kelly rather reluctantly agreed that demolition and rebuilding of blocks in addition to Tangmere (see below for issues related to Tangmere) could be a possibility on the

¹ *Site Allocations DPD Pre-Submission Version*, January 2016. Page 151

site but stressed that his department was not responsible for this decision and that no concrete plan for this had yet been drawn up. Mr Kelly stated in both meetings that the allocation of land on Lordship Recreation Ground was necessary for building new homes for decanted residents from Tangmere. Mr Pattison went further at the Area Forum on 09/03/2015 and said the land might be needed if blocks at Broadwater Farm need to be decanted, i.e. the land would house residents from more than one demolished block. While the Lordship Rec plan has now been dropped we believe that the continued inclusion of the other areas in SA62 indicates that demolition is still being seriously considered. It is obvious that the inclusion of Broadwater Farm on the Site Allocations plan does make demolitions of council blocks on Broadwater Farm a possibility and not only Tangmere, in the absence of any statement in the plan to the contrary.

The type of 'regeneration' Broadwater Farm may well face is set out under proposals for Broadwater Farm to be included in a 'Joint Venture' arrangement. On 10/11/2015 Haringey's Cabinet approved a proposal to set up a Joint Venture to 'deliver regeneration' in various areas, including potentially the Broadwater Farm. As the report states:

'The Haringey development vehicle would be a 50:50 joint venture between the Council and its private partner or partners.'²

Broadwater Farm is listed as one of the 'Sites and assets that may be transferred to the vehicle...'

We are very concerned that the proposal in SA62 to 'Improve Stock' in fact bears no relation to our aspirations but could actually facilitate wholesale demolition and rebuilding. We find evidence of this in the proposed *Alterations to Haringey's Adopted Strategic Policies 2011-2026*. Alteration 53 sets out an initial list of housing estates to be 'regenerated'. Broadwater Farm is one of the estates set out here. The reason box for Alteration 53 states that the alteration:

'Recognises the Council's commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of Council-owned homes.'³

Now according to Haringey Council's September 2015 *Future of Housing Review* the Development Vehicle the Council wishes to set up:

'is unlikely to be a refurbishment vehicle, and transfer would most likely be on the basis of decanting tenants and potentially offering them the opportunity to return.'⁴

The clear implication here is that estates on the regeneration list, including Broadwater Farm may well be knocked down. The idea of right to return is only stated as a possibility not a guarantee.

² *Haringey Development Vehicle* Report to Cabinet 10/11/2015 in *Agenda Packs*:

<http://www.minutes.haringey.gov.uk/documents/g7301/Public%20reports%20pack%2010th-Nov-2015%2018.30%20Cabinet.pdf?T=10> page 141

³ *Alterations to Haringey's Adopted Strategic Policies 2011-2026. Pre-Submission Version*. January 2016.

http://www.haringey.gov.uk/sites/haringeygovuk/files/06_haringey_strategic_policies_dtp_221215.pdf Page 17.

⁴ *The Future of Housing Review-Conclusions and Recommendations* Report to Cabinet 4.9.15 in *Agenda Packs*

<http://www.minutes.haringey.gov.uk/documents/g7299/Public%20reports%20pack%2015th-Sep-2015%2018.30%20Cabinet.pdf?T=10> page 80

Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish an estate the size of Broadwater Farm and re-provision anything but a small proportion of the homes at social rent. So-called 'Affordable Rented' housing and Shared Ownership are outside the income ranges of most Broadwater Farm residents and most Tottenham residents.

Moreover, there are clear indications that all new housing built by Joint Ventures will be private not social in any case.

In this connection we must note the report of Julian Wain, the Independent Adviser to the London Borough of Haringey Future of Housing Review. In his report of September 2015 he writes that:

'At present local authority controlled companies can hold property exempt from the right to buy, but the government has signalled its intention to remove this exemption. This will leave joint venture vehicles, part owned by the private sector as the only mechanism whereby properties can be protected for social use. These will however, not be secure tenancies; but rather private rented properties let at secure or affordable rents.'⁵

Therefore if there is new development on the estates, the tenants will only be given the option of return if they want to swap a secure, council tenancy for an insecure private tenancy. Given that virtually no tenants will want to do that, our only real option will be to accept a move onto another housing estate in Haringey. We will lose all the facilities we enjoy on this estate and gain nothing.

The Haringey Council Cabinet approved the establishment of a 'Development Vehicle' on 10/11/2015 on a Joint Venture model and tendering is now taking place.⁶

In this connection we must also mention the Council's proposed *Estate Renewal and Rehousing and Payments Policy*. This policy which is intended to determine how council tenants will be rehoused when their homes are demolished states:

'The Council will aim to offer secure tenants the option of returning to a new permanent home on their estate where possible, on a scheme by scheme basis.'⁷

There is absolutely no guarantee that council tenants will be rehoused in the new homes on Broadwater Farm. It is therefore clear that most of the council tenants in Broadwater Farm have no real interest in the demolition of their homes and refurbishment not demolition should occur.

The Alternative We Want

Broadwater Farm Residents' Association wants improvement of the existing housing on Broadwater Farm as an alternative to demolition and rebuilding.

⁵ *Final Report of Independent Advisor to the Future of Housing Review*. September 2015.

<http://www.minutes.haringey.gov.uk/documents/g7299/Public%20reports%20pack%2015th-Sep-2015%2018.30%20Cabinet.pdf?T=10> Page 160

⁶ See for example: <http://www.gva.co.uk/news/HaringeyseeksJVpartnerfor2bnestatesregeneration/>

⁷ *Estate Renewal and Rehousing and Payments Policy*

http://www.haringey.gov.uk/sites/haringeygovuk/files/estate_renewal_rehousing_and_payments_policy_-_final_draft.pdf

Throughout 2015 representatives of Broadwater Farm Residents' Association, Broadwater United Sports and Football Academy, Broadwater Farm Enterprise Centre, Back 2 Earth@Broadwater Community Centre and Friends of Lordship Rec. have been meeting together.

We came up with the following principles for improving the Broadwater Farm:

- Complete the planned Decent Homes Works program
- Do the repairs needed in the flats and blocks (including fixing leaking pipes)
- Install effective entry/security systems to all blocks
- Redecorate the estate
- Protect and improve the existing facilities and services, and the estate's environment
- Rehouse overcrowded families entitled to a bigger home if they wish

Decent Homes work should include new front doors, kitchens and bathrooms for the existing blocks. (Tangmere in addition requires new roofs, windows and other works to the exterior of the block). It should also include work to ensure good insulation and other work to the existing blocks as necessary. This modernisation of facilities will make give our flats a far more modern feel and make residents value their homes even more. Our homes will be warmer and more comfortable and our heating bills will be reduced.

New door entry systems are planned for Northolt, Stapleford, Lympe, Manston, Kenley, Hornchurch, Martlesham and Rochford this year. Tangmere, Croydon, Debden and Hawkinge have been left out however. Adding the remaining blocks to the program will bring about an improvement to our security on the estate.

We also believe that our blocks require redecoration: painting of communal areas and new, more attractive flooring. Relative to capital works such as the new doors this is relatively inexpensive and would make a huge difference to the perceptions of residents and visitors about the estate.

We wish our existing facilities to be defended and improved. Broadwater Farm Community Centre is a very valued local resource that provides a café, a gym and a football club among other services and events. We are very surprised that this facility is still being included on the Site Allocation for potential demolition. We also note that it stands on Metropolitan Open Land and we wonder how it can be imagined that it would be legally possible to demolish it in any case.

We regard improvement of housing as an alternative to inclusion on the site allocation plan as none of the improvements that are necessary would require inclusion of our estate on the Site Allocation. We believe the only reason for the inclusion of our estate as a Site Allocation is to facilitate demolitions in the future and we reject this option as unnecessary and damaging.

Broadwater Farm Residents' Association does not agree that the potential demolition of the blocks we live in should be described as a way to 'improve stock'. No report exists that indicates that the buildings on the Broadwater Farm are in any way structurally unsound. Stock should be improved by the type of Decent Homes work detailed above. In addition all the facilities and features serving and enhancing the estate should be treasured and protected. Further reasons for our opposition to demolitions will be detailed below.

Haringey Council's Unwillingness to Re-provide Genuinely Affordable Housing on Regeneration Estates

SA62 indicates that any redevelopment will lead to no loss of affordable housing. Other than the concerns about the development vehicle outlined above, we have serious concerns about the concept of so-called 'affordable housing' in this connection. 'Affordable housing', is a broad term and is not the same thing as social housing with a permanent tenancy, that is let at a social housing rent similar to those currently charged for council housing. Shared ownership or 'affordable' rented housing that can be let at up to 80% of market rent will not be affordable to most residents. If we look at Appendix C of the Consultation on Haringey's Draft Housing Strategy 2015-2020, neither option is likely to be affordable for Broadwater Farm residents. Let us take rents set at 65% of the average private sector rent for Haringey (65% is the blended average of rents for Affordable Homes in London and Haringey). We see that this figure is £812.50 per month⁸. Appendix C to the report finds this just about affordable for a household on the median Haringey household income of £33,140 a year. The same report, however, indicates that the median household income for West Green ward is barely over £20,000 a year.⁹ This would indicate that 'affordable' housing built on the Broadwater Farm site is likely to be unaffordable for local residents. The report is quite clear that shared ownership homes will not be affordable to the majority of Broadwater Farm residents. It indicates that new shared ownership homes in Tottenham require a minimum household income of £34,709 a year¹⁰.

Paragraph 3.2.2 of *Haringey's Local Plan: Strategic Policies 2013-2026* states that:

'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community they want to live.'

For the above reasons, we believe that the demolition of the Broadwater Farm and other council estates in Tottenham contravenes the Council's own policies.

We therefore state that the only way to maintain the current supply of truly affordable housing in Tottenham and on the Broadwater Farm site is not to carry out demolitions of council homes.

The Negative Equalities Impact of Demolitions on Broadwater Farm

In reference to the above section the following should be noted from the Equalities Impact report:

'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period.'

⁸ See *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C*
[http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/\\$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf) page 53-4.

⁹Ibid., page 58.

¹⁰Ibid., note 5, page 53.

Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east.

Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the general population of Haringey...

The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.’¹¹

We would also note council plans to house more homeless families outside London (see Haringey Council’s *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18*)¹². (This was a report made to the Cabinet as part of agenda papers on 16/12/2014.). Clearly demolishing social housing without appropriate replacement in areas like Broadwater Farm will lead to increasing numbers of Haringey’s homeless families being forced out of London. This pressure to move out of London, adds to the discriminatory nature of any proposal to demolish social housing. As Appendix C of the *Consultation on Haringey’s Draft Housing Strategy 2015-2020* states:

‘Black households approach as homeless at a level which is more than twice their representation in Haringey’s population compared with White households who present in numbers which are around two thirds of their representation in Haringey’s general population. This indicates that Black households are particularly affected by homelessness in the borough.’¹³

Therefore reducing the amount of genuinely affordable social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. We believe that Appendix C clearly demonstrates that Haringey Council’s policy is likely to lead to a greater reliance on home ownership schemes like Shared Ownership at the expense of genuinely affordable socially rented housing. This is additional evidence of the discriminatory nature of the Council’s plan for Broadwater Farm and Tottenham as a whole.

We are also concerned that the letters regarding this consultation have only gone out in English and that a member of the Residents’ Association committee was informed on 16/03/2015 by Haringey Council’s Planning Department that consultation responses in Turkish would not be considered. We believe this contravenes that duty of Haringey Council to consult all sections of the community equally about the Local Plan.

We believe that the Local Plan policy will discriminate against black households and the consultation on it was carried out in a way that excluded Turkish speakers. We believe that both of these factors breach the commitment in Haringey Council’s Equal Opportunities Policy of April 2012 to the fair provision of services.

¹¹Ibid., page 12

¹² *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18* at [http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/\\$ADocPackPublic.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/$ADocPackPublic.pdf) page 205

¹³ *Consultation on Haringey’s Draft Housing Strategy 2015-2020, Appendix C, page 5.*

In addition the official summary in the DPD of what the S62 zone proposal would mean is inaccurate, vague, misleading and meaningless. This renders any meaningful 'consultation' impossible, or more likely biased in favour of the Council's unilateral agenda for the area.

We are concerned that a 'regeneration' of the Broadwater Farm that leads to the building of an increase in schemes like Shared Ownership at the expense of genuinely socially rented housing would disadvantage the black community and contravene Haringey Council's commitment to equal opportunities as indicated by their own Equalities Assessment. We also believe that providing homes at 65% market rent would have a similar impact due to lower median incomes in the East of the borough as indicated on page 58 of the Equalities Assessment document.

Where will Secure Housing Tenants be Re-housed?

Thousands of council homes are potentially at risk of demolition in Haringey. Alteration 53 to the Strategic Policies lists Northumberland Park, Love Lane, Turner Avenue and other smaller sites on the list for estate regeneration. There is a proposal to build 2,000 extra homes on the Northumberland Park Site Allocation area, according to a recent council newsletter¹⁴. Given the location and size of the 'regeneration area' this will clearly involve the demolition of many council homes in Northumberland Park. Residents across Haringey are being consulted about regeneration and therefore potential demolition at many other sites such as Tamar Way, Reynardson Court, Leabank View/Lemsford Close and some blocks on Imperial Wharf.

We are concerned that with such a reduction in the supply of council housing, decanted residents from Broadwater Farm may end up with a very limited choice, if any, of where to move to.

Leaseholders and Their Tenants

Flats on Broadwater Farm often sell for a fairly low value of between £150,000 to £200,000 depending on size, as a quick survey of the Zoopla website indicates. Property values in the rest of Haringey and indeed London are much higher. Many leaseholders on Broadwater Farm will face having to move out of London entirely if their homes are demolished, even if they receive the current market value for their home.

In addition, it must be noted that the private tenants of leaseholders may end up homeless if their homes are demolished and they do not fall into one of the Council's 'priority need' categories, such as having dependent children or having a disability.

The Issue of Tangmere in Relation to the Potential Demolition of Other Council Blocks on the Broadwater Farm Estate

¹⁴http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland_park_newsletter_january_-_lores.pdf

Tangmere has a different design to the other blocks. Tangmere residents were consulted in a Homes for Haringey Steering Group in 2014 and 2015 where demolition was openly discussed. The principal reasons given for the concerns about Tangmere's future appear to be a fairly large number of leaks in the block and anti-social behaviour. At the Steering Group meeting on 18/02/2015 the Repairs Department attended and stated they were doing extensive work on unblocking pipes, as pressure from water in blocked pipes on joints was deemed to be a major cause of leaks. It was also agreed to restore lighting to unlit parts of the car park due to resident complaints about car break-ins. The restoration of lighting was done. Balcony gully drains are being unblocked from 29/2/2016 which should help stop the problem with leaks. Given we have been given no evidence of any actual structural problem at Tangmere, it must be suggested that the problems at Tangmere could probably be addressed through better management and maintenance and it does not seem likely that demolition is necessary. The meetings of the Steering Group have already brought about improvements in the block and it is rather 'lazy thinking' for Haringey Council to suggest when there are maintenance or anti-social behaviour problems in a block that demolition must be put on the agenda rather than helping residents explore other alternatives.

One point we wish to make, however, is that any problems in Tangmere that might exist should not be used as a 'Trojan Horse' for facilitating demolitions of any other blocks on Broadwater Farm. The current site allocation would enable developers to come forward with plans for demolitions of all blocks on Broadwater Farm, not just Tangmere.

If it really is the case, that only Tangmere is being considered for demolition, which seems unlikely for reasons laid out above, then it must be asked why the Site Allocations plan does not indicate that all the other blocks will definitely not be demolished. This point does not in any way indicate that Broadwater Farm Residents' Association supports the demolition of Tangmere. We do not, and insist the necessary repairs be completed.

Conclusion

Broadwater Farm provides decent quality housing for thousands of people. It is a strong, vibrant community. Huge amounts have been spent on providing concierge suites, new roofs and windows, providing a Community Centre and many other facilities. All residents want to look to the future on our estate, rather than having our lives needlessly disrupted by demolitions and decants.

On 09/03/2015 at the Area Forum, Matthew Pattison of the Planning Department indicated that Haringey Council has no evidence of any structural problems with the blocks at Broadwater Farm. The Planning Department is also clear that any redevelopment of the Broadwater Farm would not lead to a net increase in the number of houses on the site and would therefore have no impact on the Mayor of London's target for 1,502 new homes a year for Haringey. These two facts must clearly beg the question, what is the point of demolition and rebuilding?

Demolition of housing on Broadwater Farm and in Somerset Close, Moira Close and Lido Square would lead to a huge loss of socially rented, genuinely affordable housing. Residents in these Somerset Close, Moira Close and Lido Square are very angry about the proposals. They have attended meetings and lobbies against these proposals and have handed in petitions against them. Representatives of these areas spoke against the proposals alongside Broadwater Farm Residents' Association Representatives and a representative of the affected

houses on Lordship Lane at a protest meeting on 24/2/2016. Current options for 'Affordable Rent' housing or Shared Ownership housing on the site would not be genuinely affordable for the majority of households in Tottenham. Demolition and rebuilding would contravene Haringey's commitment to equal opportunities. In addition there would potentially be a huge loss of very valued community facilities such

Refurbishment and improvements as set out above are a clear alternative to the woefully inappropriate policy of demolition. As refurbishment and improvement does not necessitate inclusion on the Site Allocations plan, we believe that SA62 should be removed.

Appendix: Petition

From April 2015 around the end of 2015 Broadwater Farm Residents' Association carried out petitioning against the demolition of Broadwater Farm and surrounding areas and the building of houses on Lordship Recreation Ground. 684 people signed the paper petition. As of 29/12/2016 956 have signed the online petition (see screengrab attached.) We would note that other petitions against demolition were also carried out independently by residents of the affected areas and handed in as part of the first round of consultation.

We attach copies of the petition. Please note: some of the petitions have different wording as Lordship Rec. was taken out of the Council plans in September 2015. The petitions were carried out by different people in different places so a small number of people may have signed it twice.