

## **Haringey Defend Council Housing: Response to Haringey Council's Local Plan**

No reasonable person who has examined the Local Plan, its evidence base and its policy context, could believe that it aims to fulfill Housing policy objective 3.2:

**The council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of.**

Unfortunately, the opposite has been the case. This is a plan for social exclusion. We therefore recommend that the Local Plan should be rejected in its present form.

We will present evidence under the following headings:

1. Lack of response to the housing needs Evidence Base
2. Adverse Equalities Impact
3. Lack of consideration of the adverse social impact of Superdensity schemes
4. The Tottenham Hotspur planning application (Site allocation NT7)
5. Inadequate consultation
6. Policy recommendation and proposed alternatives
7. Arrangements for meeting the Planning inspector, including the pre-meeting

### **1. Lack of response to the housing needs Evidence Base**

The Evidence Base of the Local Plan includes a Housing Needs Assessment and a Strategic Housing Market Assessment, which both show what needs to be done to provide decent secure and affordable housing for the people in this borough, but the Local Plan completely fails to address these requirements.

#### **Haringey Housing Needs Assessment, June 2007**

[http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey\\_housing\\_needs\\_assessment\\_2007\\_0.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_housing_needs_assessment_2007_0.pdf)

This report found that there was a shortfall of 3,405 social units a year over the next 5 years (p98). The report commented that, "The analysis suggests that any target of affordable housing would be perfectly justified in terms of the need." (Executive Summary, p 6). The report called for affordable housing targets of 60% in Haringey Heartlands and Tottenham Hale, the two projected growth areas that were then expected to be built within the next five years. Furthermore, 'the profile of households in need suggests that 70% of affordable homes should be social rented and 30% should be intermediate housing priced halfway between social rents and minimum market levels' (p98).

By planning to demolish council housing, and with its vagueness about replacement properties and silence on rents and service charges, the Local Plan does not address the housing needs of lower income people, fails to respond to the analysis in this report, and fails to address Housing policy objective 3.2.

### **Strategic Housing Market Assessment, May 2014**

[http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic\\_housing\\_market\\_assessment.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf)

This report shows that the need in Haringey is for really-affordable housing, and not for the unaffordable private housing developments which the Plan would facilitate. It states that there is a gap between Total affordable supply (13,132 dwellings) and Total affordable need (24,889 dwellings). This identifies an affordable housing requirement deficit of 11,757 homes, which as a proportion of the total net housing requirement for all tenures (20,172), equates to 59% (paras 8.39 and 8.40).

To meet this need for 59% affordability within the program, the report concludes that “Overall, the evidence advocates limited potential for intermediate forms of affordable housing to contribute towards meeting housing needs in Haringey.” (para 8.66).

Based on rental costs at 30% of household income, so-called ‘Affordable rent tenures are only affordable to 25% (80% of mean market rent) and 30% (80% of median market rent) of households’ (para 5.115).

**The so-called ‘affordable housing’ to be built under the plan is therefore unaffordable to 70-75% of all Haringey households; and 39% of Haringey households are owner-occupiers.**

Furthermore, ‘the minimum deposit required to attain a mortgage of any type for the purchase of a property would be £11,500, however this comes with monthly payments in the region of £1,154.’ (para 5.81)

Yet, 48% of resident households have no savings or are in debt, and a further 22% have less than £5,000 savings. (para 5.101). This is a devastating picture of the disconnect between the policies of the Local Plan, and the limited options which ordinary people have at their disposal. Shame on the planners who offer so little to so many local people.

We are pleased to deduce from the data in the report that local authority rents average just 34.5% of unaffordable, average private rents, and that private registered provider (housing association) rents average just 40% of market. Yet much of this really-affordable housing is set to be demolished under the Plan.

The Local Plan makes no serious attempt to meet the dire housing need which the Strategic Housing Market Assessment reveals. The Plan’s minimal provision for small amounts of so-called ‘affordable housing’ does not seriously address Housing policy objective 3.2. No reasonable person could think that the plan attempts to meet this objective, taking into account the mass demolition of actually-existing, really-

secure, really-affordable dwellings which the plan entails; and the proposed reductions in affordability requirements to meet developer profits.

The council does not produce numerical estimates of demolitions. Our latest estimates show that 4,687 Haringey homes are at risk of demolition from the renewal and regeneration plans, including 3,662 homes on council estates, 630 Private Registered Provider (Housing Association) homes, and 395 more private dwellings. These estimates are based on Freedom of Information requests, the contents of the Local Plan and many other council documents, and years of campaigning work around the estates.

## **2. Adverse Equalities Impact**

### **The Equalities Impact Assessment on Haringey's Draft Housing Strategy**

In March 2015, Haringey Council published an Equalities Impact Assessment on its Draft Housing Strategy, a document which is integral to the Local Plan and to the project to demolish council housing and build mainly market dwellings (Cabinet, 17/03/2005). The impact assessment stated that “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.” The startling Mitigation offered was:

**The ability of local people to afford the new homes being built, especially in the east of the borough, is dependent on them accessing jobs and also increasing their incomes to a sufficient level to afford the new homes on offer as a result.**

**It is planned to change the profile of Haringey-based jobs so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly-skilled sectors, such as sustainable technology, digital design and skilled/ craft manufacturing.**

In response, Tottenham Labour Party passed an emergency motion at its General Committee on 25/03/15,

**This GC expresses concerns about the findings of the Council's Equality Impact Assessment (EqIA) of the Draft Housing Strategy. It clearly states that there is a “possibility, over time, Black residents of Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in the east of Haringey”.**

**Despite what the council state on their website about needing to “consider” the EqIA in their decisions, it is in fact a ‘public sector equality duty under the 2010 Equality Act’ not just to “consider”, but to**

**“eliminate unlawful discrimination” and “advance equality of opportunity between people who share a protected characteristic (i.e. Race) and those who do not”.**

**This GC is concerned the mitigation has placed the onus on “Black Residents” to “increase their income” to be able to afford the new homes on offer and not required or considered what the council should be doing to enable equality of opportunity and eliminate discrimination. The GC requires an urgent review and response so not to disadvantage residents based upon race and their related socio-economic status.**

### **Cllr Alan Strickland’s Letter**

Councillor Alan Strickland, Cabinet Member for Regeneration and Housing, wrote to Haringey Defend Council Housing on 10 April 2015. His letter included these points:

**A resident’s ability to access a particular type of housing relies on their income and circumstances. The assessment finds that black residents will receive significant support from the council’s housing approach, through council housing, temporary accommodation and HMO [houses in multiple occupation] licensing, but that black and minority ethnic groups tend to be less able to afford other housing options such as shared ownership homes.**

**Claims made by some local campaigners that the council’s housing approach would discriminate against black residents are clearly disproved by the facts in the equalities assessment. The assessment finds that black residents receive significant support through council housing - 18% of Haringey residents are black, but 34% of Haringey’s council housing is allocated to black residents. Black residents also benefit most from support provided through temporary accommodation - the biggest single group provided with temporary accommodation by the council are black female households (36% of all temporary accommodation placements).**

We believe that this brazen disregard for equality of outcomes for poor and black people informs the Council’s whole approach. The Local Plan is set to deliver the Housing Strategy in the unequal and inequitable way that Cllr Strickland describes here, and this is a gross failure to seriously address Housing policy objective 3.2.

### **3. The Tottenham Hotspur planning application (Site allocation NT7)**

The Tottenham Hotspur planning application for Site allocation NT7, agreed by the Planning Sub Committee on 16/12/2015, includes provision for 585 homes, none of them affordable, and with no guaranteed provision for offsite provision of affordable housing either. Sadly, the acceptance of 0% affordability in this keynote scheme tells us that the Council is not serious about the proclaimed inclusivity of Housing policy objective 3.2. The Council’s acceptance of the bizarre claim by Tottenham Hotspur

that it cannot afford any affordable housing at all, within a £600,000 development, gives a disastrous signal in respect of discussions with any developer or private sector partner about other developments within the Local Plan. If the most lucrative and iconic development can have 0% affordability, what chance is there of council officers delivering on any of the affordability targets within the plan? This is yet another failure to seriously address Housing policy objective 3.2.

#### **4. Lack of consideration of the adverse social impact of Superdensity schemes**

The Plan does not at any point consider the adverse social impact of Superdense private developments, both those planned to replace council estates, and those to be built elsewhere in Haringey. Our research into Superdensity, some details of which follow, indicates that these schemes will be managed to meet the aspirations of middle-income occupants, and to deliver developer and landlord profits. This will have many adverse consequences for the life chances of lower income residents and homeseekers in the borough.

Please see the two reports 'Recommendations for living at Superdensity' (2007), <http://www.designforhomes.org/wp-content/uploads/2012/03/Superdensity2.pdf> and 'Superdensity: the sequel' (2015), [http://www.pollardthomasedwards.co.uk/download/SUPERDENSITY\\_2015\\_download.pdf](http://www.pollardthomasedwards.co.uk/download/SUPERDENSITY_2015_download.pdf)

These reports were both produced by architects from four leading London practices: HTA Design LLP, Levitt Bernstein, Pollard Thomas Edwards, and PRP Architects. They are complemented by two revealing YouTube videos, 'Recommendations for living at superdensity' and 'Superdensity: the sequel', which disclose some of the issues which residents will face under the Local Plan:

- Additional and very high service charges on these estates could price-out returning resident owners, former secure council tenants, and new, poorer homeseekers. These high service charges are driven by the maintenance needs of superdense developments, by the demand of higher income residents for more services; and also by the drive of the new landlords to increase their income from chargeable services.
- Lettings or allocations policies after redevelopment could impose restrictive quotas on homeseekers who are economically inactive, or who simply have children. These are anti working class policies, and restrictions on child density are also racist in practice, because they discriminate against those cultural groups which tend to prefer larger family sizes.
- Council estates are mixed and inclusive communities at present, where council tenants, leaseholders and private renters use the same entrances and lifts. In the new housing schemes to be built under the plan, developers and scheme owners may introduce segregated blocks for homeowners and renters, separate entrances for owners and renters (so-called poor doors) and

distinctions by different dwelling sizes, or separate designs, or standards of facilities or materials, for owners and renters.

Here are the comments of Duncan Bowie of the University of Westminster, who helped to draft the density guidance in the London Plan in 2004 and 2008. Duncan was speaking in a discussion amongst architects on 'Superdensity - the Sequel: Designing high density housing and sustainable places', available on YouTube: <https://www.youtube.com/watch?v=fsiFU-BzsnM>

**The density limits in the London Plan were called rigid. When you have got a situation where a half to two-thirds of schemes given planning consent breach the density policy, I don't know how loose you want it to be. Higher densities came about, because lower densities were seen as getting in the way of maximising units, and seen as getting in the way of developer profit.**

**But it actually has meant we have driven a coach and horses through the principles of sustainable residential quality, and we are not getting the mix of either affordable housing or family-sized housing out of hyperdensity, and some of the superdensity schemes are struggling at higher ranges of 300 and 400 dwellings per hectare as well.**

**The issue of service charges is critical. We are not getting social rents any more, you are getting higher rents anyway, service charges are not covered by Housing Benefit, you are not getting affordable housing out of hyperdensity schemes, and not much out of superdensity either. We have got it completely wrong, we need to go back and implement the policy on lower densities that we wrote in the London Plan back in 2004.**

We are aware that Housing Benefit covers most service charges at present. However that can change with benefit caps now and in the future, under this government. In the meantime, people would be hit hard by these charges, as soon as they go into low paid work. Car parking (presently free to Haringey council estate residents) is another everyday cost that is a source of financial risk to tenants and residents, which council officers and planners need to be honest about. But we see no sign of that. The Plan's failures to address any issue of potential social exclusion mean that its authors have made no serious attempt to address Housing policy objective 3.2.

## **5. Inadequate Consultation**

The resident consultation on the plan has been unacceptable. Denial of policy has been standard, with council officers repeatedly claiming that there are no plans at all to demolish council estates. Of course there are no specific plans, but there are plenty of plans to make such plans, in the Local Plan itself.

The Council has not followed the consultation model proposed by the Housing Committee of the Greater London Assembly in its report '*Knock it down or do it up? The challenge of estate regeneration*' (February 2015): respectful, inclusive, truthful, engaging properly with those citizens who do not agree with mass demolitions, and allowing estate residents to have a Yes/No vote on demolition proposals in a secret ballot, with a No vote to be respected; as is the practice in the London Borough of Westminster.

A serious attempt to address Housing policy objective 3.2 would mean engaging properly with residents, including those who disagree. But that has not been the case in respect of this Local Plan.

## **6. Policy recommendation and Alternative proposals**

The present Local Plan fails to properly address issues of social inclusion, and indeed it seems actively to promote social exclusion and social cleansing. The Plan therefore tends to bring the borough into disrepute: something that we neither need nor deserve.

The Plan should be redesigned to minimise the impact of government cuts and austerity policies on the many low-income households within Haringey. There should be a proper discussion about the risks as well as the opportunities of working with private developers. The council must make its partnerships work for the people, rather than primarily for developer profits. New housing schemes must be designed with social inclusion to the fore, meeting the existing high standard of multi tenure council housing estates, and without poor doors or exclusionary lettings policies. Any new high density estates must feature developer capitalisation of service charges, to avoid pricing out tenants and lower-income property owners. Where densification is needed, it must be accomplished sensitively and without being targeted against a single tenure, whether that be council housing, as in the Local Plan under consideration, or against any other tenure.

The present Local Plan should therefore be withdrawn and a new one prepared, based on meeting the housing and community needs of existing and likely future Haringey residents. An important element in the new plan should be the retention of, and proper investment in, the borough's council housing estates. We also need a substantial new build programme of more and better council housing. The new Plan should promote secure, decent and really-affordable housing for residents of all incomes, including those on lower incomes, the poor, and benefit claimants.



We look forward to working with the Council on the preparation of such a revised Plan, which actually addresses the needs of local people.

**7. Request to meet the Planning inspector, including attending the pre-meeting**

We wish to meet the Planning Inspector to discuss the above points, and also we wish to attend any pre-meeting. This is because we are an active community-based group with serious evidence-based criticisms of the lack of soundness of the present Local Plan proposals, and we also have positive suggestions to make.

Yours faithfully

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