


Ref:  (for official use only)	<b>Local Plan</b> Publication Stage Response Form	
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Name of the DPD to which this representation relates:

<b>Tottenham AAP</b>
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**Please return to London Borough of Haringey by 5pm on Friday 4<sup>th</sup> March 2016**

This form has two parts:  
 Part A – Personal Details  
 Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

## Part A

1. Personal Details <sup>1</sup>	2. Agent's Details
Title	<input type="text"/>
First Name	<input type="text" value="David"/>
Last Name	<input type="text" value="Morris"/>
Job Title (where relevant)	<input type="text" value="Coordinator"/>
Organisation (where relevant)	<input type="text"/>
	<input http:="" ourtottenham.org.uk"="" type="text" value="Our Tottenham network&lt;br/&gt;&lt;a href="/> http://ourtottenham.org.uk, Planning Policy Working Group (contact persons: David Morris, Anne Gray, Claire Colomb)"/>
Address Line 1	<input type="text" value="██████████"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text" value="██████"/>
Telephone Number	<input type="text"/>
Email address	<input type="text" value="████████████████████&lt;br/&gt;████████████████████&lt;br/&gt;████████████████████&lt;br/&gt;████████████████████"/>

<sup>1</sup> If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

## Part B – Please use a separate sheet for each response

Name or Organisation: **Our Tottenham network** <http://ourtottenham.org.uk>  
**Planning Policy Working Group**

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy **AAP3:  
HOUSING** Policies Map

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.  
 If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The **Our Tottenham network brings together 50 key local community groups, projects and campaigns** standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <http://ourtottenham.org.uk/>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham. **Organisations affiliated to the Our Tottenham network** include (as of 1.03.2016):

- Bull Lane Playing Fields Campaign / Weir Hall Action Group
- Chestnuts Community Centre
- Clyde Area Residents Association
- Day-Mer
- Defend Haringey Health Services
- Dissident Sound Industry Studios
- Find Your Voice
- Friends of Downhills Park
- Friends of Lordship Rec
- Growing-In-Haringey Network
- Haringey Alliance for Public Services
- Haringey Defend Council Housing
- Haringey Federation of Residents Associations
- Haringey Friends of Parks Forum
- Haringey Green Party
- Haringey Housing Action Group
- Haringey Independent Cinema
- Haringey Justice for Palestinians
- Haringey Left Unity
- Haringey Living Streets

- Haringey Needs St Ann's Hospital
- Haringey Private Tenants Action Group
- Haringey Solidarity Group
- Haringey Trades Union Council
- Living Under One Sun
- Lord Morrison Hall / Afro International
- N.London Community House
- Peoples World Carnival Band
- Selby Centre
- The Banc
- Tottenham and Wood Green Friends of the Earth
- Tottenham Chances
- Tottenham Civic Society
- Tottenham Community Choir
- Tottenham Community Sports Centre
- Tottenham Concerned Residents Committee
- Tottenham Rights
- Tottenham Theatre
- Tottenham Traders Partnership
- Tower Gardens Residents Group
- Tynemouth Area Residents Association
- Ubele
- University and College Union at CONEL
- Urban Tattoo
- Wards Corner Community Coalition
- 1000 Mothers' March Organising Group
- 20's Plenty for Haringey

See a description of our member at: <http://ourtottenham.org.uk/about/supporting-groups/http://ourtottenham.org.uk/about/supporting-groups/>.

This response, formulated by the **Our Tottenham Planning Policy Working Group** (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the **Our Tottenham Local Economy Working Group**, is based on the principles embedded in the **Community Charter for Tottenham** agreed by the **Our Tottenham network** at our first Community Conference on 6 April 2013 (available here: <http://ourtottenham.wordpress.com/community-charter/>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the *Our Tottenham* network are available on our website. The **Our Tottenham Community Charter** and subsequent revisions are enclosed in **Appendix 1** of the present submission.

**This response builds upon the previous responses we submitted:**

- i. in March 2014, in response to the public consultation on *the draft Tottenham APP Regulation 18 Consultation Document*;
- ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the *Tottenham AAP, February 2015 version*. Our response (in two parts) is available here:

[http://www.haringey.gov.uk/sites/haringeygovuk/files/our\\_tott\\_network\\_-\\_pp\\_working\\_grp\\_taap\\_overall\\_response.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_taap_overall_response.pdf)

[http://www.haringey.gov.uk/sites/haringeygovuk/files/our\\_tott\\_network\\_-\\_pp\\_working\\_grp\\_taap\\_detailed\\_response.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_taap_detailed_response.pdf)

The present response needs to be read in conjunction with the separate response we have submitted about the **Alterations to Strategic Policies 2011-2026. Haringey's Local Plan. Pre-Submission Version January 2016** (thereafter referred to as **Alterations**).

In para. 1.24 of the AAP, the concerns of the local community which arose out of previous consultations are rather well summarized:

Initial consultation on the broad proposals for Tottenham was undertaken in January 2014. A number of public consultation events were also held that attracted over 80 residents and stakeholders. The full report is available on the Council's website. In summary, consultation feedback highlighted a number of common themes:

- The need for the AAP to be clear about what is being proposed (i.e. where and why, as well as the implications for local neighbourhoods, local residents and businesses);
- That the area is already densely populated and concern as to whether the number of new residential developments proposed for Tottenham is appropriate and equitable in a Borough-wide sense;
- That existing deficiencies in community infrastructure (including health care facilities, primary school places and local open space) serving the area will be further exacerbated if additional housing is added - new infrastructure provision must be secured and not just promised;
- Concern that regeneration will lead to the gentrification of Tottenham, with existing residents and businesses forced out of the local area;
- A desire to see the distinctive existing character and heritage of neighbourhoods retained and preserved;
- The need for further detail on employment provision, including: the types of jobs proposed to be delivered, how these will be secured for local benefit and greater clarity on the proposals for existing local employment sites, including proposals to support, retain (including through relocation) and grow local businesses, as well as the need to secure affordable workspace; and
- That regeneration in Tottenham should not be solely for, or in the hands of, major developers and landowners but should be in collaboration with the existing community.

**However, we feel that many policies and site allocation proposals in the Tottenham AAP directly ignore those concerns, and are based on unsound evidence.**

**In the first part of our response, we focus our response on Policy AAP3 HOUSING. In the second part of our response, we have made detailed comments on each of the sites listed in the Tottenham AAP (see [Appendix 2](#)).**

### **POLICY AAP3: HOUSING**

- A To improve the diversity and choice of homes, and to support mixed and balanced communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes;
- B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation;
- C Development proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised.
- D To better address the concerns of viability in delivering wholesale renewal on Haringey's housing estates in Tottenham (as listed in Alt53 of the Local Plan Strategic Policies), the Council will support higher density mixed tenure development, as a mechanism to:
- a improve the quality and range of affordable housing options,
  - b better address housing needs in Haringey;
  - c secure a more balanced community; and
  - d increase housing delivery in Tottenham.

## 1. Has the plan been positively prepared?

*The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development (p. 63 of the Alterations document).*

We argue that several policies and proposals made in the *Tottenham AAP* **do not meet the existing local communities' requirements** (from both residents and businesses). On the contrary, they represent an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Tottenham to the detriment of current communities and of Tottenham's character. This particular affects Tottenham, as a significant amount of foreseen development is concentrated in this part of the Borough.

Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). The *Alterations* fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.

a) In several ways the AAP do not fulfill, or contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING of the Strategic Policies, in particular: '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.'

b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment ([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), p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The *Alterations* (Para 3.2.18) state that the Council 'aims to ensure an adequate mix of dwellings is provided' but there is no detail as to how this will be achieved, especially with regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered. Given the extensive need in Haringey for social housing for families, how can this approach be described as a 'strategy which seeks to meet objectively assessed requirements?' The Council says responding to family housing need is 'a priority for the Council', so the question is, will this plan address this in making provision of family housing for people living here?

The proposals for the "renewal and improvement" (including demolitions) of the council housing estates listed in the Strategic Policies, SP2 point 10, p. 42, do not include comprehensive detailed options for re-housing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing need. A large consultation exercise carried out by the Council to gauge people's priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.<sup>2</sup>

There are serious questions which need to be answered regarding the concept of 'rent'. 'Affordable' levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to rent in many buildings (see next section).

<sup>2</sup> 2014 Tottenham's Future Consultation Report, at <http://www.haringey.gov.uk/regeneration/tottenham/tottenham-regeneration/tottenhams-future>

c) The Council's Sustainable Community Strategy (2010-2016)<sup>3</sup> states 'We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes'. With Government cuts and caps to benefits affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the *Alterations* rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-2019<sup>4</sup> challenges the concept of 80% market rent being a suitable ceiling of 'affordability', works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme<sup>5</sup> focuses on identifying small infill sites within existing council estates and building on them subject to detailed consultation work with local residents.

The plan needs to provide enough social housing to meet the needs of Haringey's housing waiting list within a 5 year period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and sub-standard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.

In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any **further increase** in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need **at least 16,300 social rented units over 15 years or 1,066 per year**. This is more than 100% of the previous building targets **for all types of housing** before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing needs in other boroughs which are currently less crowded or in 'new town' type developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2.

Remarkably, Haringey Council's own Joint Strategic Needs Assessment states that 'to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required' (see <http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing#levelofneedofpopulation>). This simply cannot be achieved without overspill to other areas. But it is clear that the *Alterations*' target of only 40% of units to be 'affordable' is absolutely inadequate and there is little clarity that 'affordable' would include social rented housing which families in Tottenham on low incomes could afford.

<sup>3</sup> [http://www.haringey.gov.uk/sites/haringeygovuk/files/sustainable\\_community\\_strategy.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/sustainable_community_strategy.pdf)

<sup>4</sup> <http://www.islington.gov.uk/publicrecords/library/Housing/Business-planning/Policies/2014-2015/%282014-06-03%29-Housing-Strategy-2014-2019.pdf>

<sup>5</sup> <http://www.brighton-hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods>

## 2. Is the plan justified?

*This means that the Plan should be founded on a robust and credible evidence base involving:*

- *Evidence of participation of the local community and others having a stake in the area.*
- *Research/fact finding: the choices made in the plan are backed up by facts.*

*The Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved (p. 63 of the Alterations document).*

### **2.1 Evidence of participation of the local community and others having a stake in the area:**

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 not enough evidence of community participation encouraged or promoted by the LPA in this final round of consultation which goes beyond a minimum. Independently of this part of our submission, we presented a more detailed analysis of the consultation process and its shortcomings (see text box below). The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended. This is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs 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 (see <http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive>). This would have been the most effective method for directly communicating with residents. The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet with their members.

The **Supreme Court in the Moseley v Haringey Council** judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' It is questionable as to whether this condition to allow for 'intelligent consideration and response' has been met with regard to this vital consultation on the Local Plan.

#### **Consultation issues**

The Council's 'Statement of Community Involvement' says that the Council will provide summaries in plain language. Although in correspondence with *Our Tottenham* last year, a senior Council officer expressed the view that to provide summaries would lead to confusion about whether the public should respond to the summary without reading the full text, we think summaries should have been provided at the library drop-in sessions and elsewhere (community centres, online, and in *Haringey People*) and that without them, it is difficult for residents to gain interest in or grasp the meaning and significance of the full text to which they are required to respond.

The Council did not pro-actively seek to involve non-English speaking communities with special meetings for example with Turkish translators. There was also some delay from the start of the consultation period in accessing translation apps for the documents online.

From the start of the consultation the Council were reluctant to provide any hard copies of the documents. They claimed that a set of the documents were available in libraries and that was good enough. Latterly they accepted it was not sufficient and provided copies to community representatives and groups. In addition, an extra two sets were provided to each of the open public libraries and a set was sent to elected councillors with the instruction that they should make their copy available to their electors.

The first tranche of consultation events were held at Haringey's public libraries during the day time. This prevented those with 9-5 Monday to Friday jobs from attending. At Coombes Croft and Alexandra Library our members observed that they were the ONLY members of the public

present. At Wood Green there were only 5. Cllr Clive Carter reported to Friends of Finsbury Park that only one person had been recorded as attending the consultation at Highgate Library. Later in the consultation period a number of evening events were organised. However, these were poorly advertised - mainly through the council website - and since most residents only use the Council web site, if at all, if they are looking for something they already want or know about, it was no surprise that they failed to attract people to get along. One evening event - held at 639 High Road, where the council's Tottenham regeneration team have an office - was attended by only one member of the public. In desperation, council officers resorted to standing on the High Road failing to entice passers-by inside.

There was no mention of the consultation in the February-March 2016 edition of the Council's borough-wide publication *Haringey People*. Not having a major article on the Local Plan in the one publication going to all households, and not placing advertisements in the local press, is a serious failure to engage as many people as possible in the consultation. Indeed, many residents may have known nothing about the consultation until some residents complained to the press (see [http://www.thetottenhamindependent.co.uk/news/14246972.Council\\_criticised\\_over\\_Local\\_Plan\\_consultation\\_timings/](http://www.thetottenhamindependent.co.uk/news/14246972.Council_criticised_over_Local_Plan_consultation_timings/)).

The provided documents contain many mistakes. For example, in the Site Allocation DPD, section SA62 on Broadwater Farm gives a contradictory account in different parts of the page about who owns the land and neglects the private ownership of houses in Lordship Lane which may be marked for demolition under the proposed plan. The map for this page shows the boundary of the redevelopment zone going through the middle of a very large and important building, the Broadwater Farm Community Centre. Section SA15 concerning Whymark Avenue, N22, contains the extraordinary statement that 'no buildings need be retained' even though it contains a new block of mixed residential and retail units only about three years old which presumably had planning permission when constructed. Another mistake is that on the map Bruce Grove station is represented as a national rail station, when it has been a London Overground station for several months.

## **2.2 Research/fact finding: the choices made in the plan are backed up by facts:**

**We would like to challenge some key assumptions and evidence base used to justify Policy AAP3 HOUSING of the Tottenham AAP, which itself reflect the Alterations to Policy SP2 HOUSING of the Strategic Policies (see our separate response), under 3 broad themes:**

- **Overall scale of housing growth and implications for existing and future social infrastructure**
- **The question of affordability**
- **The chosen approach to housing provision and to 'housing estate renewal'**

### **1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure in Tottenham:**

a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were adopted in March 2015. The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP. The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the GLA SHLAA - an 83% increase. This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The distribution of targets across London Boroughs displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly context and oppose this massive increase affecting the Borough of Haringey. We made a submission during the public consultation on the Further Alterations to the London Plan in 2014 (here



<https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf>) and presented evidence at the EiP at Session 2b (Housing need and supply) on Wednesday 3 September 2014 to make this argument. It was ignored in the subsequent version of the FALP post-EiP. These figures are unsustainable, unrealistic and unfair. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. In the response by the LB Haringey to the consultation on the Further Alterations to the London Plan (in 2014), Steve Kelly, Assistant Director of Planning, himself noted that this was a 'stretching' target that it would not meet on its own without external GLA funding and support (<https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf>).

b) The Tottenham AAP identifies land capable of delivering 10,000 new homes and 5,000 new jobs. We contest the scale of this growth and its concentration in Tottenham. The proposal to concentrate half of the housing delivery target (=10,000 homes) in Tottenham is particularly not realistic and potentially very highly damaging to the existing residents and businesses, environment and character of the area (see our Response to the Alterations to Strategic Policies 2011-2026). We disagree with the fact that Tottenham should host half of this targeted growth. Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). Bruce Grove, St Ann's, Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too.

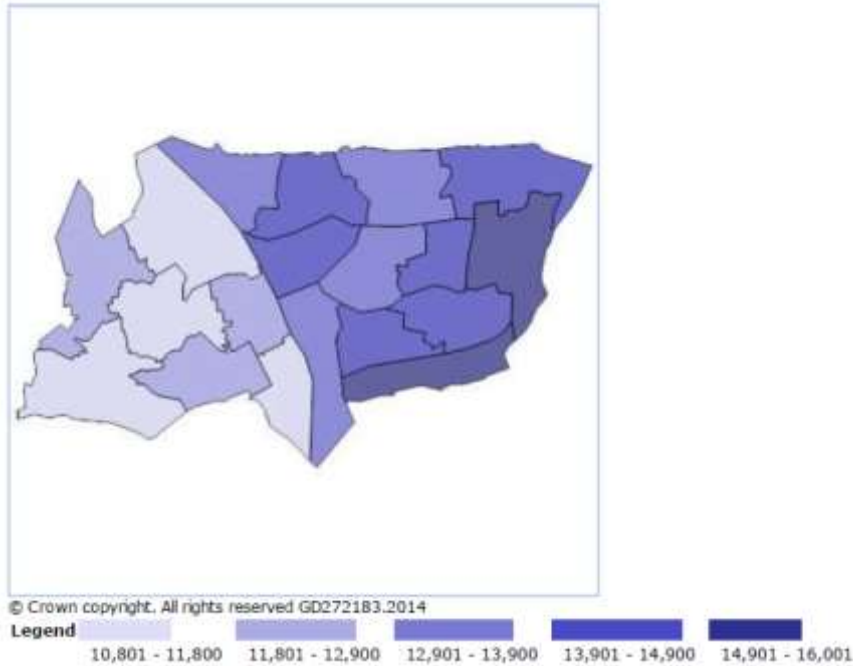
**QS102EW - Population density in Haringey<sup>6</sup> (from 2011 census)**

ONS Crown Copyright Reserved [from Nomis on 2 March 2014]  
The wards highlighted in yellow are located in Tottenham.

2011 ward	All usual residents	Area Hectares	Density (number of persons per hectare)
E05000268 : Bruce Grove	14.483	93,14	155,5
E05000277 : St Ann's	14.638	109,73	133,4
E05000278 : Seven Sisters	15.968	129,20	123,6
E05000273 : Hornsey	12.659	105,54	119,9
E05000275 : Noel Park	13.939	122,97	113,4
E05000279 : Stroud Green	11.758	109,46	107,4
E05000280 : Tottenham Green	14.580	136,10	107,1
E05000267 : Bounds Green	13.725	138,40	99,2
E05000284 : Woodside	14.514	149,21	97,3
E05000282 : West Green	13.372	139,84	95,6
E05000269 : Crouch End	12.395	143,99	86,1
E05000271 : Harringay	13.272	156,16	85,0
E05000283 : White Hart Lane	13.431	169,72	79,1
E05000281 : Tottenham Hale	15.064	191,15	78,8
E05000276 : Northumberland Park	14.429	188,48	76,6
E05000274 : Muswell Hill	10.784	165,16	65,3
E05000270 : Fortis Green	12.488	199,44	62,6
E05000272 : Highgate	11.632	249,89	46,5
E05000266 : Alexandra	11.795	261,27	45,1

<sup>6</sup> <https://www.nomisweb.co.uk/census/2011/QS102EW/view/1946157250?cols=measures>

QS102EW - Population density



Tottenham has the highest level of social deprivation and suffers from a chronic shortage of key facilities such as GPs, open space, schools etc...Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. This is an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough.

How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in this AAP. A precise list of the needed social infrastructure, with supporting evidence, to cater for (i) the backlog of need and (ii) anticipated growth is needed in the next draft AAP, with precise proposals for location on particular sites. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the AAP.

There should be a strict policy of protection of existing community centres - some of which are under threat or seeking renewed or longer leases - of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.

We consequently demand that any new development encouraged by the AAPs should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents in and near Tottenham, in particular:

***i. Adequate levels of GP and health services provision:***

In London the average is 1639 patients per GP, according to a Kings Fund report on '*General Practice in London*'<sup>7</sup>. However, by going through the information for each practice provided for patients on <https://www.myhealth.london.nhs.uk/>, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below<sup>8</sup>. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average, than London GPs in general.

<sup>7</sup>[http://www.kingsfund.org.uk/sites/files/kf/field/field\\_publication\\_file/general-practice-in-london-dec12.pdf](http://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/general-practice-in-london-dec12.pdf)

<sup>8</sup>Data on the GPs was collected from <http://www.nhs.uk/Service-Search/GP/LocationSearch/4> and <https://www.myhealth.london.nhs.uk/>, taking in all practices which are within one mile of St Ann's Hospital and/or 639 High Road, N17 and which are also located within Haringey boundaries.

Patients per doctor in Tottenham					
Name of surgery	Map ref *	Map ref*	No. of patients registered	No. of GPs** in the practice	Patients per GP
Spur Road Surgery		2	970	1	970
Dr AUK Raja		12	1019	1	1019
Dr RS Caplan & Partners		22	6660	5	1332
Dr K Sivasinmyanathan & Partner		1	2913	2	1457
Dr R Singh & Partner		25	3028	2	1514
Tynemouth Road Health Centre		19	9116	6	1519
THE BRIDGE HOUSE SURGERY		24	9903	6	1651
West Green Surgery		4	7525	4,5	1672
Dr DK Kundu		20	1698	1	1698
Lawrence House Surgery		3	10507	6	1751
Dr DK Suri	2		1887	1	1887
JS Medical Practice		5	3860	2	1930
Dr AP Ansari		10	1978	1	1978
Charlton House Medical Centre		23	6140	3	2047
Dr ATM Hoque		11	4334	2	2167
Park Lane Medical Centre	6		2345	1	2345
Somerset Gardens Family Health Care Centr	7		11929	5	2386
The Old Surgery 572 Green Lanes		13	2469	1	2469
Grove Road Surgery		8	2661	1	2661
Havergal Surgery		14	5444	2	2722
Dowsett Road Surgery	5		3037	1	3037
Bruce Grove PHCC		16	8979	4	2245
Westbury Medical Centre		18	8169	6	1362
The Morris House Group Practice		15	11722	2	5861
Broadwater Farm Health Centre		9	3549	1	3549
Dr KR Jeyarajah & Partner	3		4345	1	4345
CASTLEVIEW SURGERY	4	21	8979	4	2245
Total			145166	72,5	2002

So in effect Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. The existing situation may even be worse than that for at least three reasons:

- The number of GPs in this calculation assumes that they are all working full-time, except for one who says on the practice web site she is part-time and was counted as half. If other GPs are in fact working only part-time, the number of patients per *full time equivalent* GP would be higher.
- As a deprived area with therefore a relatively high incidence of various illnesses, and moreover many people for whom English is not their first language, Tottenham probably imposes on GPs a heavier workload per patient than the London or national average.
- Since Tottenham is characterised by a highly transient population with many migrants and students, the proportion of the resident population actually *registered* with a GP may be unusually low. If all who are entitled to be registered did register (regarded by the NHS as a desirable goal to keep people out of A and E departments) the number of patients per doctor might rise considerably.

This raises the question of what specific plans are being made for extra health infrastructure in the Area Action Plan and Site Allocation documents. This is simply not clear. If an extra 10,000 homes bring in an extra 25,000 people (the exact number obviously depends on the size of dwellings and the vacancy rate), this population would need an extra 15 GPs to provide for their needs at the London average ratio of patients to doctors. A further 16 GPs are needed to reduce the patient/doctor ratio for the *existing* registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25 existing practices listed in the attached spreadsheet, even if all the partners working there wanted to take on new colleagues. So a number of new doctors' surgeries will be needed and provision for them needs to be made within the land allocations for social infrastructure.

This has important implications for the future of the St Ann's Hospital site. It is a large area of land currently devoted to health service use and capable of housing one or more GP practices, possibly also an urgent care centre, which would serve the N15 area as a whole. This would be the obvious and probably the most economical way to address the 'doctor deficit' in South Tottenham. However it is too far from the new housing developments planned around High Road West and the northern part of N17, for which additional health use land will be needed.

**ii. Adequate levels of quality, public open space (including major new spaces to address areas of deficiency), play areas and sports facilities:**

Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's *Guide to Preparing Open Space Strategies - best practice guidance of the London Plan*, there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (November 2005), Objective 1.2, reads: '*To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.*' '*Priority: High*' '*Timescale: Immediate*'.<sup>9</sup> That Action Plan still applies. To achieve minimum standards requires a massive expansion of provision. So the AAP and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.

**Parks:** The *Haringey UDP 2006* states: '*Haringey's open space falls below the National Playing Field Association's 2.43ha per 1000 of the population, standing at only 1.7ha*'. This is a substantial shortfall requiring an increase of 43% just to meet minimum standards. The *LBH Open Space Strategy* para 3.7 further recognises that Haringey residents have far less open space per resident (590 residents per ha) than the London average (363 per ha).

**Allotments:** The *LBH UDP* recognised that there's '*an estimated requirement for up to 1552 plots of [additional] allotment land*'. This represents an additional 31ha, according to the *Atkins Assessment*, on which this is based [Atkins Vol. 1, para 8.67]. However, Atkins Vol 1, para 8.55 states: '*The way in which plots are promoted and publicised also influences demand. At present very little active promotion and publicity has taken place*'. Even to achieve the artificially low number of total plots required, every ward should have an average of around 175 plots (about 15 plots for every 1000 residents). For example, the three wards in South Tottenham currently have a combined total of 63 plots and hence require an additional 462 plots to meet needs. There are only 63 plots for the whole of N15 and only 22 plots in the N4 area of Haringey. There are no plots at all in Bounds Green, Bruce Grove, Harringay, Hornsey, Noel Park and Northumberland Park wards. The only site in St Ann's ward has just 8 plots, and the one site in Tottenham Green ward only 21 plots, therefore residents in those wards have little chance of obtaining a plot near to them. There are in fact

<sup>9</sup> The LBH website has maps of areas of deficiencies for various types of open space: [http://www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/policy\\_and\\_projects/local\\_development\\_framework/openspace\\_rec.htm](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm)

It should be noted that some of the Council's definitions of deficiency do not meet the London Plan standards so the actual areas of deficiency are greater than shown on some of the maps.

11 wards in Haringey which have less than 0.24 ha of allotment space per 1000 residents. Many residents are on waiting lists for allotments.

**Children's Play Areas:** the NPFA minimum standard for children's play is 0.2-0.3 ha outdoor equipped playgrounds and 0.4-0.5 ha informal play space per 1000 population, i.e. 0.6-0.8 ha children's play space per 1000 residents. There should be a Local Area for Play within 60 metres of all homes, and a Local Equipped Area for Play (with at least 5 types of play activity equipment) within 240 metres. To achieve minimum standards requires a massive expansion of provision.

**Areas of Nature Conservation and Reserves:** As recognised [LBH OSS para 3.27], English Nature minimum standards recommend there be Local Nature Reserves of 1 ha per 1000 residents - currently in Haringey there is only 0.16 ha per 1000, therefore requiring a 7-fold increase. LBH OSS 3.28 recognises that the LPAC/GLA standard for areas of nature conservation value is a catchment area of 280 metres. LBH OSS 3.28 suggests this '*could potentially be addressed by creating additional habitats on sites where none currently exist*'. While additional habitats on existing sites are to be welcomed, this will not come near to addressing the deficiency unless a substantial number of new sites are created.

**Outdoor sports pitches:** The Council's Open Space Assessment [The Atkins Study] recommends that the '*minimum standard of access to outdoor sports pitches within Haringey should be that "All households should be no more than 280m from an outdoor sports pitch in secured public use"*'. To achieve this minimum standard requires a massive expansion of provision, including the creation of new green spaces.

**In terms of sports facilities,** The Haringey Open Space and Sports Assessment (2003) provides excellent information on the need to address deficiencies of a whole range of much needed facilities. Since then the population of Tottenham has increased greatly, and is projected to increase even further. The Council has produced a number of useful sports-related plans including: LB Haringey Sport and Physical Activity Action Plan 2005; LB Haringey Tennis Development Plan - 2010-2013; LB Haringey Football Development Plan - 2009-2012; LB Haringey Football Development Plan - 2009-2012. As an example, the Football Development Plan (Section 4 - Key Issues and Recommendations) contains detailed and useful recommendations about facilities, education, club development, health, Voluntary Sector development, girls and women's development, disability development, celebrating cultural diversity, coach education, and disaffected young people. Key recommendations regarding facilities include:

- '*develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed*'
- '*develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use*'
- '*develop the use of s. 106 agreements ..... to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible and inclusive to meet the demand of an increasing population*'.

Here are some extracts from the Summary of the **Football Development Plan** regarding Facility development:

**Accessibility:** *The Haringey Open Space and Sports Assessment identified a 400m walk as the appropriate catchment for football pitches. At present, around half of the population of the borough is outside such a catchment.*

**Localised facilities:** *To seek to provide at least one multi-use games area in each of the 19 wards in the borough, to support local efforts to expand the small-sided game. Reviewing the size and quality of the hard play areas at all 62 primary school sites in the borough and making improvements as appropriate, to facilitate skills training for the 5 - 11 year old age group.*

**Overall sports participation rates:** *The overall rates of sports participation in Haringey are below the regional and national averages, according to the 2008 Active People survey. Participation by under-represented groups: The Active People survey found participation amongst under-represented groups such as women, BME groups and disabled people is disproportionately low in*

*Haringey.*

Football conversion rates: *FA data shows the proportion of footballers as a percentage of the overall population is significantly lower in Haringey than for London or England as a whole. The mini-soccer figures are lowest of all, with conversion rates only 20% of the national average.*

Small-sided football: *Small-sided football is poorly developed at junior level, with no teams at all in the borough. Eight of the 19 wards in Haringey do not have a kickabout area at present.*

Pitch provision: *There are currently enough football pitches to meet existing demand in Haringey, but the number of pitches per capita is well below regional and national averages. This suggests current provision is only adequate because local demand levels are suppressed, possibly as a result of the lack of pitch supply. Quality of pitches and ancillary facilities: 17% of all football pitches are in poor condition, 22% do not have access to changing facilities and 60% do not have any on-site social facilities.*

### **iii. Adequate levels of school provision (and other educational facilities):**

According to a report compiled by Haringey Council in 2013<sup>10</sup> there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41). Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, *'planning for further capacity within local primary and secondary schools as well as any special school provision will be an important component in ensuring that additional school place provision is joined up and sustainable'* (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: *'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School, Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision... There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best'* (pp. 69-70).

## **2.2.2 The question of affordability**

a) The assumptions in the **Housing Market Assessment** about growth rate of house prices and rents are far too low. Values applied to the viability calculations (i.e. how many 'affordable' units developers can reasonably be asked to build whilst leaving them an 'acceptable' profit) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that 'medium value' areas like Wood Green (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010 and now. But they have risen enormously! Average sales prices of residential property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19<sup>th</sup> 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since as noted in Haringey's Homelessness Strategy, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data

<sup>10</sup>[http://www.haringey.gov.uk/school\\_place\\_planning\\_appendices\\_2013.pdf](http://www.haringey.gov.uk/school_place_planning_appendices_2013.pdf)

shows Haringey lower quartile rents are £1,257 monthly and lower quartile GROSS earnings are 74% of lower quartile rents.<sup>11</sup> This means that the conclusion of the **Housing Market Assessment** that most of the new housing will be 'unaffordable' for existing Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.

b) There is also considerable ambiguity about what the affordability of 'rent' means in the context of the 'affordable rent' concept. 'Affordability' is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is 'affordable' may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.

c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann's Hospital, in South Tottenham, the community group which formed the St Ann's Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for (i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.

### 2.2.3 The chosen approach to housing provision and to 'housing estate renewal'

**Obj. 4 of the AAP (p. 32) proposes a 'different kind of housing market'. We oppose the wording and the approach suggested by this with regard to the social housing estates located in the East of the Borough, and earmarked in the Strategic Policies for 'renewal and improvement', namely:**

- **Northumberland Park**
- **Love Lane**
- **Reynardson**
- **Turner Avenue**
- **Leabank View / Lemsford Close**
- **Park Grove and Durnsford Road**
- **Tunnel Gardens, including Blake Road**
- **Noel Park**
- **Broad Water Farm**

**The arguments below underpin the site-specific comments we have made with regard to each of these housing estate sites.**

a) There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities'. What does this mean? The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has

<sup>11</sup> <http://www.londonpovertyprofile.org.uk/indicators/topics/housing-and-homelessness/rents-and-affordability/>

also been demonstrated by research recently carried out by University College London (the Bartlett School of Planning).<sup>12</sup>

b) There is no evidence that the development of 'mixed' communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier response submitted in March 2015 (see text box below) a mass of academic and policy research evidence to show that drawing in higher-income residents to 'dilute' council estate populations leads to disruption of community networks, class-segregated living and social tension, rather than greater cohesion. The history of many London estates where this 'solution' has been applied testifies to this, and there is extensive academic research which confirms it.

#### 'Tenure mix policies' as tools of 'regeneration': evidence from research

Concentrations of social housing are viewed as a negative feature which should be addressed through 'mixed tenure' and 'mixed communities' policies. We question the claim that housing regeneration through estate renewal and new build has the potential to create new residential neighbourhoods and improve the quality, mix, tenure of housing in the area if this is done via demolitions, a net loss of existing social housing units, and the creation of highly divided new developments with gated/separated market-rate housing in areas of existing social housing. Such development would also increase densities unacceptably, reduce the green and amenity space serving the occupants, and cause unnecessary social disruption to the estate's community during the works. The objective of 'mixed and balanced communities' should not be done through demolition or a reduction in the net stock of social housing, insufficient community participation, overall net loss in the number of social housing units after regeneration, decanting of the original population and gentrification as unfortunately has been the case in other parts of London (Woodberry Downs in Hackney, Aylesbury in Southwark...).

If such a policy is applied only to social housing residents (as it is here), it is clearly discriminatory and arguably unlawful.

There has been a lot of research done, over the past fifteen years, about the effectiveness of such policies in dealing with socio-economic deprivation, the social problems of an area and generally the regeneration of a neighbourhood. Such policies are based on the notion of the '*neighbourhood effect*' (or *area effect*), which hypothesizes that a high concentration of poor, or ethnic minority, people in specific areas reinforces and perpetuates poverty and exclusion. The key assumption is that mixing different types of housing tenure would lead to greater *social mix* and to positive effects for (poor) urban residents and for deprived neighbourhoods at large. This is achieved by getting higher income groups to live there (and rarely by bringing bring lower income residents to rich neighbourhoods). **The conclusion of the majority of the studies carried out in the UK and in countries where similar policies have been carried out is that there is rather limited evidence that interventions in the housing mix alone can lead to greater social mix and to positive effects for deprived urban neighbourhoods and their residents, in particular tenure mix interventions in social housing estates.**<sup>13</sup> Often old and new residents live parallel lives side by side with little

<sup>12</sup> See the EU-funded DIVERCITIES project reports, which show the incredible vitality of social and community networks in Tottenham: [http://www.urbandivercities.eu/wp-content/uploads/2013/05/UK\\_WP5\\_FinalReport.pdf](http://www.urbandivercities.eu/wp-content/uploads/2013/05/UK_WP5_FinalReport.pdf) and [http://www.urbandivercities.eu/wp-content/uploads/2015/08/UK\\_WP6\\_final\\_report.pdf](http://www.urbandivercities.eu/wp-content/uploads/2015/08/UK_WP6_final_report.pdf)

<sup>13</sup> See among others:

ARBACI, S. and RAE, I. (2013) *Mixed tenure neighbourhoods in London: policy myth or effective device for social mobility?* In: *International Journal of Urban and Regional Research*, 37(2), pp. 451-79.

CESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: *International Regional Science Review*, 32 (3): 343-375, 2009.

CESHIRE, P. (2007) *Are mixed communities the answer to segregation and poverty?* York, Joseph Rowntree Foundation. Available at: <http://www.jrf.org.uk/publications/are-mixed-communities-answer-segregation-and-poverty> .

CESHIRE, P., GIBBONS, S. AND GORDON, I. (2008) *Policies for 'mixed communities': a critical evaluation*. London, UK Spatial Economics Research Centre. Available at: <http://cep.lse.ac.uk/textonly/SERC/publications/download/SERCPP002.pdf>.

LUPTON, R. and FULLER, C. (2009) *Mixed communities: a new approach to spatially concentrated poverty in England*. In: *International Journal of Urban and Regional Research*, 33 (4): 1014-1028.



contact. Social worlds, places of consumption and socialisation are markedly different (different supermarkets and pubs, for example), and newcomers often send their children to private schools outside the area. Additionally, mixed-tenure neighbourhoods do not necessarily lead to an improvement in the quality of local services and amenities if there is no parallel public investment and if the incoming middle-class households consume such services outside the neighbourhood or recur to the private sector. There is no evidence that 'the new resources that may come with higher income residents (e.g. shops) either materialise or are beneficial to people on low incomes'<sup>14</sup>, for example through job opportunities.

Whilst it is true that residents in areas of concentration of social housing, such as Northumberland Park, suffer considerably worse outcomes than the national average for selected indicators of deprivation (e.g. income, general and mental health, educational attainment, benefit claims), the causal explanation for this does not reside with the fact that they live in a mono-tenurial area. Sociological research has clearly shown that individual and family characteristics are more important than the *neighbourhood* in explaining individual life trajectories. Research has even shown that in some cases mixing policies can have negative impacts on low-income or ethnic minority groups, because, through the influx of new residents and new services, such interventions may break social networks and endanger businesses catering for a low-income population or for specific ethnic minority groups, leading to more class or ethnic conflicts. Many sociological studies have since long shown that a degree of concentration may benefit particular social or ethnic groups, which means that an imposed de-concentration may break crucial community ties. The presence of family networks, small businesses, support organisations and informal networks can support the process of survival and of socio-economic integration or social mobility. Social mix policies were provocatively labelled 'faith-based displacement activity' by the respected LSE economist Paul Cheshire (2009), who argued that they treat the symptoms of urban deprivation and inequality rather than tackling its causes.<sup>15</sup>

Altogether, in the UK, there is thus 'substantial evidence that areas with more mixed social composition tend to be more popular, more satisfying to live in, and have better services than poorer areas', but 'to date the evidence is limited that neighbourhood has a large effect on individual outcomes, over and above individual and household factors. Nor is there robust evidence that neighbourhood mix per se or changes to mix (over and above other neighbourhood characteristics) is influential'<sup>16</sup>. The authors of the evidence review commissioned by the DCLG in 2010 on the evaluation of past mixed communities policy conclude that it is *not* evident that mixing communities are a more effective strategy for the regeneration of disadvantaged neighbourhoods than traditional neighbourhood renewal approaches – i.e. those which target public resources to particular areas to support integrated strategies of social, economic, and physical regeneration in partnership with local residents:

*'if there had to be a crude choice between traditional urban and neighbourhood renewal and mixed communities policies to address the top quarter most deprived local authorities (as Neighbourhood Renewal Fund did) or even the most deprived 10% or 5% of wards, the evidence suggests the former offer more limited but better-evidenced benefits at lower costs, and are also more achievable during a recession. If there is a choice between doing nothing in deprived areas and doing something, the evidence suggests doing something. The evidence suggests that:*

*(a) There should be continued support for 'traditional' urban and neighbourhood renewal,*

MIXED COMMUNITIES EVALUATION PROJECT TEAM (2009). *Evaluation of the Mixed Communities Initiative Demonstration Projects. Initial Report: Baseline and Early Process Issues*. London, DCLG. Available at: <http://eprints.lse.ac.uk/27143/>  
MIXED COMMUNITIES EVALUATION PROJECT TEAM (2010) *Evaluation of the Mixed Communities Initiative Demonstration Projects. Final report*. London: DCLG. Available at:

<https://www.gov.uk/government/publications/mixed-communities-initiative>

TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>

<sup>14</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

<sup>15</sup> CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: *International Regional Science Review*, 32 (3): 343-375, 2009.

<sup>16</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

which might include a modest mixing element.

(b) On the precautionary principle, and on the grounds that the costs of preventing non-mix are lower than those of altering it, mix should be encouraged in new developments, and through any schemes to support developers and registered social landlords during the housing market downturn.

(c) Mix should be considered in existing areas through methods such as pepper potted-tenure change, tenure blurring, sensitive allocations policy and targeted fiscal stimulus'.<sup>17</sup>

c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by *Architects for Social Housing* citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety<sup>18</sup> and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive. But no objective criterion or argument is given about what constitutes the 'ideal' tenure mix, or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in <http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing>), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing in London, the central objective of the plan as **stated in the Strategic Policies - Housing Policy SP2 can only be achieved if a high proportion of social housing is maintained**. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.

d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.

e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.

f) The rise in private sector rents, induced by the expectation of a 'gentrification' of Tottenham and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting lists there, and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in Haringey so as not to disrupt children's education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be the housing association's responsibility. There will then be a displacement effect on social housing waiting lists elsewhere in London as the housing associations struggle to find homes to re-house people whose homes they have sold for demolition.

<sup>17</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

<sup>18</sup> On their website, <https://architectsfor-social-housing.wordpress.com/>, Architects for Social Housing write: 'Since its regeneration following the 1985 riots, Broadwater Farm has had one of the lowest crime rates of any urban area in the world. In an independent 2003 survey of all the estate's residents, only 2% said they considered the area unsafe, the lowest number for any area in London. The estate also has the lowest rent arrears of any part of the borough. With £33 million investment, a community centre, neighbourhood office, children's nursery and health centre have been built, social projects, sports clubs and youth programs have been funded, concierges introduced, raised walkways removed, murals painted, communal gardens planted, transport links improved, shops and amenities made accessible, a more representative Tenants and Residents Association installed, and an estate isolated out on a flood plain of the River Moselle has been turned around and integrated into the Tottenham community'.

### **2.3 Is it the most appropriate strategy when considered against the alternatives?**

No.

There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (<https://architectsforsocialhousing.wordpress.com/page/2/>) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources. According to a report from the Urban Lab and Engineering Exchange at University College London, 'there is a growing body of research suggesting that extending the lifecycle of buildings by refurbishment is preferable to demolition in terms of improved environmental, social and economic impacts'<sup>19</sup>. See also the *Our Tottenham Housing Factsheet: Demolition vs Refurbishment* <http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-v-refurbishment/>.

Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see <https://www.sovereign.org.uk/about-us/strategic-asset-management/>). We would expect to see a similar assessment of whether the Haringey Plan's proposals for estates such as Northumberland Park or Broadwater Farm represent best value for public money, taking into account also the intangible *social* costs and benefits of each alternative such as keeping the community together and continuity of children's schooling. For one specific group of estates, the 'Orlit' homes in Bounds Green, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment **is technically feasible**.

**See our response to the Alterations of the Strategic Objectives, where we highlight a series of alternative mechanisms/options/policies to creating extra low-cost homes and reducing rent levels. These alternatives have not been fully considered in the Tottenham AAP:**

- a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops owned by the Council.
- b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.
- c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last a year with a week's vacant period in between. This factor alone could 'provide' the equivalent of an extra 700 homes just by reducing the vacancy rate). It could be done through a non-profit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.
- d) buying empty and hard-to-sell homes to let to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.
- e) facilitating self-build and community non-profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has chosen to rely, is presented

<sup>19</sup> 'Demolition or refurbishment of social housing, a review of the evidence', Oct. 2014

as 'the only show in town' and used as justification for failures to implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.

f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.

g) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.

h) logistical help for older people who own much larger homes than they need (3-5 bedrooms) to let rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.

i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.

j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting, and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.

k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded via the private sector element of the development.

If the intention is to have a genuinely 'mixed community' which meets the housing needs evidenced in many reports, the Local Plan should include these other options and ideas.

Regrettably the phrase 'mixed community' appears to be used in the context of the Haringey Local Plan in the way critiqued by some academics 'who question the evidence base for social mix policies and rhetorics that advance processes of gentrification' (*Mixed Communities; Gentrification by Stealth?* Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).

### 3. Is the plan effective?

*This means the Plan should be deliverable, embracing:*

- *Sound infrastructure delivery planning;*
- *Having no regulatory or national planning barriers to delivery;*
- *Delivery partners who are signed up to it; and*
- *Coherence with the strategies of neighbouring authorities.*

*The Plan should also be flexible and able to be monitored.*

*The Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The Plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Plan should make*

*clear that major changes may require a formal review including public consultation.*

*Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report (p. 63 of the Alterations document).*

We have several concerns regarding the effectiveness of the proposed AAP.

a) **Policy AAP3 and the site-specific proposals for sites currently occupied by social housing estates** will result in expulsion of many residents who will be 'priced out' of Tottenham into neighbouring areas or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.

b) As we have extensively argued above, there is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre<sup>20</sup> and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building.

Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided.

c) According to Cabinet papers revealed to the public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on **a variety of actors and development partners** in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community partners such as coops, community land trusts or social enterprises.

#### **Is it deliverable?**

Many of the **site-specific proposals in the AAP** are potentially not deliverable.

a) The plan involves serious over-development of many sites as already stated in point 2(d) above.

b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.

c) The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being 'beaten down' in negotiations on the proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development.

d) As we have argued in our response to the *Alterations to Strategic Policies*, the *Alterations*, and their translation into Policy AAP1 and AAP3 of the Tottenham AAP, reinforce the fact that is a one-dimensional plan which relies on private developers and a buoyant housing market to achieve its

<sup>20</sup> In Site Allocations DPD SA62, the community centre building is mainly within the development zone, but curiously the boundary actually goes through the building. There is no commitment that the masterplan will ensure preservation of the community centre.

objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?

e) Part of developing alternative approaches would be to examine eventualities which might occur – in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined zones.

f) Haringey's proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.

### **Is it flexible?**

As we have argued in our response to the *Alterations to Strategic Policies*, the *Alterations*, and their translation into Policy AAP1 and AAP3 of the *Tottenham AAP*, make the plan inflexible since it is one-dimensional as described above in paragraph d.

a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.

b) There is nothing in the plan to say what will happen is the envisaged strategy (overall or for specific sites) cannot be achieved. We know from the Council's latest proposal for a Joint Venture Company approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the market affects one particular private sector partner, the one which will be chosen as 50% owner of the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.

c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late 'noughties' caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.

d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp decline in market values and 'lettability' in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in Northumberland Park. Homes being left empty could lead to dereliction and social problems (such as a 'sink estate' reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.

e) Our over-riding concern is that refurbishment should always be considered as an option alternative to demolition.

### **Will it be able to be monitored?**

We have concerns that the *Tottenham AAP* cannot all be properly monitored.

a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the *Alterations* says nothing about how much 'affordable' housing will be built on each main site. This is also the case in the Site Allocation DPD and in the Tottenham AAP.

We would expect that at the least, targets for 'affordable' units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area. We also note that it is not clear whether the 'affordable' percentage target of 40% is calculated as 'new build affordable/total new build' or 'new build affordable/(total new build minus the number of social rent properties demolished or amalgamated into larger units)'.

b) The 'housing trajectory' graph (Appendix 1, p. 58 of the *Alterations*) which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the 'affordable housing' proportion of the total cannot be monitored against the target year by year.

#### **4. Is the plan consistent with national policy?**

As stated above, the *Tottenham AAP* fail to demonstrate how they will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).

The *Tottenham AAP* fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.

##### **Equalities legislation:**

The effect of the *Alterations to Strategic Policies*, the *Alterations*, and their translation into Policy AAP1 and AAP3 of the *Tottenham AAP*, would be an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. National policy (the Equalities Act) would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact that the plan will 'dilute' and drive out the existing residents of Tottenham means that negative impacts will disproportionately affect ethnic minority people. Appendix C to the *Consultation on Haringey's Draft Housing Strategy 2015-2020* also demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states:

'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. 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.'<sup>21</sup>

We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory,

<sup>21</sup> *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C. Page 12.*

*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)

given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year.<sup>22</sup> Such incomes clearly make so-called Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is the GLA's affordability criteria, see page 53 of *Appendix C*).

We believe that the policy of demolishing council estates therefore breaches the commitment in Haringey Council's Equal Opportunities Policy of April 2012 to the fair provision of services. 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 where they want to live.'<sup>23</sup> In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan. It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.

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*). (This was a report made to the Cabinet as part of agenda papers on 16/12/2014)<sup>24</sup>. Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing numbers of Haringey's homeless families being forced out of London. This 'social cleansing' aspect, adds to the discriminatory nature of the proposal to demolish social housing. As *Appendix C of the Consultation on Haringey's Draft Housing Strategy 2015-2020* states<sup>25</sup> '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.' Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory nature of the Council's plan for Northumberland Park and Tottenham as a whole.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

**As a consequence of the arguments presented above and in our response to the Alterations to the Strategic Policies, we would like to see changes in the formulation of POLICY AAP3 HOUSING:**

**POLICY AAP3 A:** *To improve the diversity and choice of homes, and to support mixed and balanced communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes;*

- Lower the 10,000 target, whose burden unfairly falls on Tottenham, and justify how the extra needed social infrastructure, in addition to the existing backlog, would be provided.

**POLICY AAP3 B:** *The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the*

<sup>22</sup> Ibid. Page 58.

<sup>23</sup> *Haringey's Local Plan 2013-2026*

[http://www.cartogold.co.uk/haringey/text/strategic\\_policies\\_2013\\_doc/03\\_people\\_ahoc.htm#3.2](http://www.cartogold.co.uk/haringey/text/strategic_policies_2013_doc/03_people_ahoc.htm#3.2) Paragraph 3.2.2.

<sup>24</sup> *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

<sup>25</sup> *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C, page 5.*



*exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation;*

- We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%. It should be increased to the maximum possible.
- We disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, it is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price range of low income families in Haringey. A truly affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low-income Haringey residents is social rented. 'Affordable' should not be defined as 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. We therefore demand that
  - a separate and clear percentage for social rented housing be set in the affordable housing provision target;
  - 70% of that affordable housing target should be social rented housing.

**POLICY AAP3 D:** *To better address the concerns of viability in delivering wholesale renewal of Haringey's housing estates in Tottenham (as listed in Alt53 of the Local Plan Strategic Policies), the Council will support higher density mixed tenure development, as a mechanism to:*

- a improve the quality and range of affordable housing options,*
- b better address housing needs in Haringey;*
- c secure a more balanced community; and*
- d increase housing delivery in Tottenham.*

We support Haringey Council's objective as laid out in para. 3.2.2, Policy SP2 HOUSING that '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'. **This key priority can only start to be met by embedding the following principles CLEARLY in the wording of Policy AAP3 D (on housing estate renewal in Tottenham):**

- No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.
- Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.
- There should be absolutely NO NET LOSS of social housing units and no displacement of existing tenants as part of any plan for an estate. The proposed wording 'reprovide the same amount of social housing on an equivalent floorspace basis' does not guarantee those principles, and should be rephrased.
- There should be no demolition of structurally sound homes.

**Please note** your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Extensive work done by the *Our Tottenham* Planning Policy Working Group on planning issues, building on a network of 50 key community groups, residents' associations and other organisations active in Tottenham.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.*

9. Signature

**David Morris, for the  
Our Tottenham Planning Policy Working  
Group**

Date:

**4.03.2016**

## Part B – Please use a separate sheet for each response

Name or Organisation: **Our Tottenham network** <http://ourtottenham.org.uk>  
**Planning Policy Working Group**

10. To which part of the Local Plan does this representation relate?

Paragraph

Policy

[Section 05:  
Neighbourhood  
Areas and  
Opportunity  
Sites](#)

Policies Map

11. Do you consider the Local Plan is (tick):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4.(3) Complies with the Duty to  
co-operate

Yes

No

Please tick as appropriate

12. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.  
 If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**See the detailed comments made for each specific site directly into the PDF version of the Tottenham AAP, using “sticky notes”, in Appendix 2.**

**Based on the arguments presented above, we would like to see the following principles reflected in the site requirements and development guidelines for all the sites listed in the Tottenham AAP.**

**GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES OF THE AAP**

**These principles were spelled out in Our Tottenham Response to the previous draft of the Tottenham AAP (February 2015 version). They are based on the *Our Tottenham Community Charter* (Appendix 1) and represent a consensus about how new developments should protect existing residents and businesses and enhances their quality of life and opportunities. THESE PRINCIPLES SHOULD BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES for all the sites in the revised AAP.**

**Under Site Requirements, proposals for each site should:**

1. Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey, or being predominantly vacant or derelict). No housing that is structurally sound should be demolished. It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and

blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.

2. Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)
3. In Tottenham, conform to the Community Charter for Tottenham
4. Conform to best practice for similar sites around the UK and Europe
5. All new housing on the site should be high quality and genuinely affordable:
  - An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.
  - A quality home means all of the following: Secure; Physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards ie Parker Morris standards plus 10% more space - and access to adequate outside garden space); It should comply with, and not exceed, the density matrix as set out in the London Plan, and built to 100% lifetimes homes standards. Designs should promote a permeable and convivial street pattern; protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.
  - As stated in the Haringey Local Plan, Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing heights in the various neighbourhoods should be respected and all new housing sites should conform to such patterns. In some very exceptional circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys as long as there is no overshadowing or blocking of light to nearby residences, or key sightlines.
6. Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible
7. Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.
8. No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.
9. All new facilities (residential, commercial, social) to be environmentally sustainable, ie conform to highest carbon-neutral criteria
10. Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list
11. For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.
12. Change of use of a site will only be allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.
13. A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.

**Under Development Guidelines, proposals for each site should:**

- a. For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx.. European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.
- b. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby
- c. Any prospective developer must demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.
- d. If there is an expression of interest for a Community Plan for the site a minimum period of 12 months shall be set aside to enable such a Plan to be developed before any further action is taken
- e. All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships.

13. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

**See the detailed comments made for each specific site directly into the PDF version of the Tottenham AAP, using “sticky notes”, in Appendix 2.**

**Please note** your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

14. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

15. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Extensive work done by the **Our Tottenham Planning Policy Working Group** on planning issues.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.*

16. Signature

**David Morris, for the  
Our Tottenham Planning Working Group**

Date:

**4.03.2016**