

From: Friends of Lordship Rec / Dave Morris - Respondent Number 74

To the Haringey Draft Local Plan EiP Inspector - Programme.Officer@haringey.gov.uk

28.7.2016

Further statement regarding SA62

The following points are in response to the Questions set by the Inspector or relating to recent material. They refer mainly to attached Appendices which illuminate the history and importance of the 'Broadwater Farm Area' and its communities, community led improvements and public investment - which may be referred to during the debate at the EiP.

It is worth re-stating that very many of the Friends of Lordship Rec's 1,400 members live in the targeted area, and that all residents of the area are users or potential users of our park. Hence we have an obligation to speak up for our membership, our local communities and all park users. Indeed, all the hard work over the last 15 years that we have put into the exemplary community-led regeneration of Lordship Rec has been for the benefit of our members and our local communities. We want to ensure these very residents and communities can continue to enjoy the renovated park, and are not to be 'blighted' or forced out of the area by bad and 'top down' planning policies.

We also want to emphasise that we are not 'anti-Council' as we have developed a very real and constructive regeneration partnership with the Council, especially its Parks Service, throughout the last 15 years. We believe that a partnership of equals, based on mutual respect, and seeking community-led improvements and outcomes for local people, is the way things should work.

A. The Questions

The key questions put: *'Is the allocation consistent with National and Local Plan policy and in conformity with the London Plan, in providing a mixed and balanced community? Can you demonstrate that estate renewal* is the most appropriate option when considered against all reasonable alternatives? This should take into account the investment in community-led regeneration, existing community facilities, the existing residential community and that no additional capacity has been identified.'*

* Note: There is no definition of what "Estate Renewal" means - it seems to be mainly the threat of mass demolitions and private redevelopment.

We also note the Inspector's Note 4: *'Estate regeneration/renewal - many of the representors make comments about losing their homes, complete demolition, stress, being displaced, loss of community and loss of community facilities. Can the Council consider whether additional development guidance might be appropriate carrying forward some of the guidance in addressing 'working with local residents groups' 'displacement' 'the residential community', community facilities, etc?'*

B. Comments and responses

1. The Council has not replied to most of the key and relevant points we raised, and then only in the most general and vague - almost meaningless - terms saying they want to *'improve housing estates and improve permeability within the area'*. The reason SA62 is included is, they say, due to the *'size of the estate'* and *'the opportunities that exist to improve conditions for residents'*. These claimed improvements *'could take many forms, and decisions on what these are, including the scope for demolitions have not been made at this point. This allocation serves to indicate further engagement regarding how this site can be improved for the benefit of local residents, and requires that these be set out in a detailed masterplan.'*

The 'size of the estate' and the unspecified 'opportunities to improve conditions for residents' at some unidentified later point seem arbitrary (and therefore unsound and arguably unlawful) as well as unacceptable in planning terms. Indeed, improvements throughout the area (and masterplanning) have been happening continuously over the last 30 years with residents' support and involvement, without the need for any 'red zone' to achieve these. Indeed, a 'red zone' could have the opposite effect, creating continuous uncertainty and preventing further improvements and leading to lack of investment and 'blight'.

2. The Council's consistently repeated position is that this red zone is only about Broadwater Farm Estate. If so the Council should accept before the EiP starts that all other areas should be removed from the red zone SA62, as Lordship Rec already has been - this will save a great deal of time, effort and unnecessary stress all round.

3. Re: EiP Question: '*Is the allocation consistent with National and Local Plan policy and in conformity with the London Plan, in providing a mixed and balanced community?*'

See our previous response regarding the range of policies this proposal breaches. Such fundamental policies and objectives are surely the basis of the purpose of the planning system and process, and must be taken seriously if they are not to be seen as just spin and window-dressing to cover up ugly hidden agendas.

We support the submissions by the Broadwater Farm Residents Association, and the relevant strategic points by the Our Tottenham Planning Policy Working Group, regarding the negative impacts of the Council's current housing demolition and redevelopment strategy for those tenants (Council and private) and homeowners who live on or near Council estates. The fact that Council estates have been targeted in this way seems arbitrary and discriminatory. It is widely believed that the real and unstated agenda is 'social cleansing' (forcing ordinary people out of Tottenham), property speculation with public property (sale of Council land) leading to the sacrificing of the real needs of local people.

Tottenham currently has much more ethnically, socially and age-related mixed and balanced communities than most parts of London, and red zone SA62 is particularly so. With rents and house prices rising alarmingly throughout Tottenham and Haringey (and London), what is needed in order to maintain the fantastic mix we have in our communities is the protection and expansion of social housing and genuinely affordable housing - not threats to social housing as represented for example by SA62.

4. We note the housing status of the homes under threat if the 'red zone' is allowed to remain, and the widespread stress this is already causing.

[See Appx 1 - Existing Housing Tenure (Within SA63 - now SA62) - from Haringey Council]

[See Appx 2 - Extracts from Interviews with local residents and community representatives. By Wendy Charlton for her 'SA62:Home' art project]

5. Comment re 'Tall Buildings' and 'Taller Buildings'.

We have already set out our objection to the arbitrary designation of the three modern and low-rise housing association estates in the zone as 'suitable for tall buildings, 6-11 storeys' - seemingly and bizaarely the only such site in the whole borough outside of the major transport hubs, as identified in the Urban Characterisation Study Map. We objected to that, and still object. We understand that the Council's approach has changed, on the one hand dropping various specific 'designations' (the area doesn't seem to appear on the Tall Buildings map now), but that new policies proposed could mean that 'taller' buildings of up to 10 storeys could theoretically be plonked in all kinds of locations throughout Haringey. We strongly object to this irresponsible approach that was rejected by the previous Planning Inspector after much debate at the previous EiP over the character of the borough. He ruled specifically that Haringey was predominately suburban as characterised by 2-3 storey buildings (except at a few major transport and commercial routes, where up to 6 storeys might be appropriate, and the odd hub where a tall building might be appropriate).

6. Protecting public investment

The SA62 area is characterised by very strong communities and should be celebrated. Lifetime Neighbourhoods policies seek to establish and protect the kind of strong and engaged communities with a wide range of relevant services and facilities that we have here. The huge public investment into the area (that has been attracted and achieved by genuine community consultation, engagement and empowerment; by highly articulate and motivated community organisations; and by exemplary community/Council partnership-working) needs to be acknowledged, respected, honoured and protected.

This investment includes the £33m+ regeneration of Broadwater Farm estate (eg concierges, redesign of walkways and street-level shops and areas, plus recent extra investment in decent homes works) and its grounds (eg landscaping and play areas), on-site facilities (eg Community Centre, Opportunity Centre, Enterprise Centre and workshop spaces), the Health Centre, an award-winning Children's Centre, £5m public investment into the park, the building of the 3 modern low-rise housing association estates, a new bus route through Broadwater Farm and so on... The most recent major investment, in 2014, has been the magnificent and exemplary £14m 560-place Broadwater Farm Inclusive Learning Campus primary school, incorporating and integrating children with disabilities.

For many, north London's notorious Broadwater Farm housing estate remains synonymous with the savage riots that took place there in 1985. But as is often the case, perception is rather different from the truth. In actual fact, Broadwater Farm today couldn't be further from the caustic cauldron of urban menace it once was. Astonishingly, the £33m regeneration programme implemented in the early 1990s has helped foster a socially inclusive urban enclave which now enjoys one of Britain's lowest crime rates and among the highest levels of perceived resident safety in London. But there have been big physical as well as social changes across Broadwater Farm too and one of the most significant of these is the estate's £14m new primary school. The Broadwater Farm Inclusive Learning Campus (ILC) has been designed by Gollifer Langston Architects and espouses a pedagogical programme almost as radical as the social transformations that have taken place in the surrounding estate. (4.9.2014, the architectural correspondent of 'Building' - The UK's leading magazine for construction professionals)

We invite the Inspector to come and see our area for yourself, and what has been achieved. I would be happy to serve as a guide. We are very proud of all the effort that has been put in by so many people over the last 10, 20, 30 and 40 years.

7. Re: EiP Question: *'Can you demonstrate that estate renewal is the most appropriate option when considered against all reasonable alternatives? This should take into account the investment in community-led regeneration, existing community facilities, the existing residential community and that no additional capacity has been identified.'*

As previously noted, *'estate renewal'* is undefined and can be construed as rather Orwellian if referring to mass demolition, displacement and destruction of communities, and redevelopment. Instead, landlords and the Council, in collaboration with residents, should fulfil their legal and moral obligations for the proper maintenance of the homes and areas, as landlords and as local authority, via the rents and taxes they collect and grants they receive - that's only to be expected.

The following section goes into a little more depth about the area, its communities, its facilities, its history of improvements and of public investment. Hopefully it will help those to be better understood.

C. Specific sites in the area and relevant matters

8. Regarding the Broadwater Farm Community Centre (including the Lordship Rec sports pitches and the Centre's Harmony Gardens].

The Community Centre is crucial to the functioning of the sports pitches and the Broadwater United youth sports teams (who train in the purpose-built sports hall there many days of the week). It also sits on Metropolitan Open Land and is integrated into the regeneration strategy for Lordship Rec (including public investment into the grounds of the Centre, the local community-run Harmony Gardens).

[See Appx 2 - Interviews with Martin Burrows (Harmony Gardens) and Clasford Stirling MBE (Broadwater

United FC]]

[See Appx 3 - Statement by Broadwater United, 25.3.2015, in response to Draft Local Plan]

[See Appx 4 - Celebration of Lordship Rec 'QE2' Status, April 2013 - including history of the sports pitches].

The Broadwater Farm Community Centre itself is integral to the wider area, and has a very important history. It was campaigned for by the local community, funded by public investment, and for much of its life run as a Trust by the local community (chaired variously by Bernie Grant MP, David Lammy MP and London's former Deputy Mayor Nicky Gavron, currently Chair of the London Assembly Planning Committee).

[See Appx 5 - Misc documents about the Broadwater Farm Community Centre, 1998-2002]

9. Regarding the Broadwater Farm Estate itself

[See Appx 2 - Interviews with Clasford Stirling MBE (Broadwater United FC, and Broadwater Farm Community Centre founder), Desmond McLeod (BWF resident) and Inga Bystram (BWF resident)]

[See Appx 6 - Misc documents about the Broadwater Farm Estate history and importance, and its community, facilities and services]

10. Regarding Moira Close

This is a pleasant, nationally recognised, historic, wheelchair-accessible, low-rise housing association estate with a strong community. It was opened in 1973 by Prime Minister Edward Heath as the UK's first inclusive and accessible housing scheme.

[See Appx 7 re the history and importance of Moira Close and its community]

11. Regarding Somerset Close

This is a beautifully designed, modern 2-storey cul-de-sac estate

[See Appx 2 - Interview with Hasibe Guler (Somerset Close resident and petitioner) re views on the history and importance of Somerset Close and its community]

12. Regarding Lordship Lane

[See Appx 2 - Interview with Seray and Yusuf Mertdjan (Lordship Lane residents and petitioners) re the importance of the Lordship Lane homes and community]

13. Regarding Lordship Rec

[see Appx 8 - re the history and importance of Lordship Rec and its community-led regeneration]

D. Miscellaneous other matters

14. The Council have said they will do Masterplanning/consultation for SA62 before any decisions are made. We note that:

- the 'red-zoning' pre-empts such consultation and is therefore unlawful and in breach of the public consultation principles set by the Supreme Court
- most of the affected SA62 areas, except for the Broadwater Farm estate, were not included in the consultation in early 2016 (despite requests to do so)
- In any case, doing 'consultation' does not mean that the views of residents will actually have any influence. Just that they will be 'consulted'.
- the Council's Love Lane Estate / High Road West consultation tactics do not lead to confidence that any consultation over SA62 will be genuine (see the Our Tottenham respondent's Feb 2016 Appendix ' Local Traders Condemn 'Sham' Council Consultation / North Tottenham High Road West Controversy Deepens ')
- On 25th November 2015 Cllr Stickland (Haringey Council Cabinet Member for Regeneration and Housing) wrote a letter to London AM Jenny Jones (former Deputy Mayor of London), following her objection to SA63 as the BWF Area then was. This letter is inaccurate and an attempt to manipulate statistics and 'spin' what little consultation had occurred with residents of just one of the Broadwater Farm blocks into a justification for the red zone *'to bring long term improvement to both the homes on the estate and the lives of the people who live in them'*.

[see Appx 9 - the Cllr Stickland letter to Baroness Jenny Jones AM re Broadwater Farm, and a critique of its

inaccuracies]

- it is also worth noting that the same people who unilaterally in Jan 2015 proposed the red-zoning of the northern third of Lordship Rec and its sports field for house-building, in contravention of almost every conceivable key planning, ethical, legal, consultative and common-sense criteria*, are still in charge of this planning and 'regeneration' process and no doubt still hold to the same agenda * *designated Metropolitan Open Land, with Fields In Trust protective covenant in perpetuity, under a 25 year legal contract with Lottery having just spent 5m in 2012 in a exemplary project, direct conflict with key partners, and so on..*

15. The Council's responses to the Draft Local Plan SA63 in 2015

- It may be worth re-reading / noting some of the Council's responses to SA63 objections in 2015, as set out in their Regulation 22 (1) (c) Consultation Statement October 2015 SA63 (2-page Summary based on 293 respondents), and Appendix F (16) Site Allocations consultation report Appendix 2.12 (SA63). It can clearly be seen that the vast majority of respondents called for the whole red zone to be scrapped, not just the Lordship Rec part. The Council said it had dropped Lordship Rec because of the public response - but this response should have led to the whole red zone being dropped.

[See Appx 10 - Regulation 22 (1) (c) Consultation Statement October 2015 SA63]

16. The local campaign

When the Local Plan proposal for red-zone SA63 was revealed in early 2015, local people were shocked and stunned. The key community organisations in the area got together to inform residents about the proposals and to encourage them to take part in the consultation. In early 2015 over 200 residents and park users attended a public meeting called by the campaign, held in the Community Centre. In early 2016, over 65 local residents attended a second public meeting to hear about the revised proposal. As a result of discussions at each of these meetings, and a drop-in/consultation event organised by the Broadwater Farm Residents Association specifically for Broadwater Farm residents, the campaign produced a specific list of actual improvements being sought by residents of the estate.

[See Appx 11 - Improvements actually wanted to Broadwater Farm]

17. General relevance of the above points

We believe that many of the above points apply to other red-zoned sites in the Local Plan, and cast doubts on the underlying 'regeneration' policies being proposed. We therefore hope that the Inspector will note this when looking at other sections of the 4 key documents. We are an affiliate of the Our Tottenham network and broadly support its approach and submissions.

18. The petitions

- We are not sure if the SA62 online petition (956 signatories) and the hard copy petition (684 signatories) are fully acknowledged in the Inquiry official records. See the summary of what was handed over by the Broadwater Farm Residents Association (and signed for by the Council) on 4.3.2016. .

[See Appx 12 - List of BFRA submission documents, 4.3.2016]

sincerely

Dave Morris
Chair, Friends of Lordship Rec

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