

**From:** Paul Burnham [Haringey\_DCH@outlook.com]  
**Sent:** 13 January 2017 01:04  
**To:** LDF  
**Subject:** Revised: Responses to Consultation on Modifications to the Local Plan

**Importance:** High

Dear colleague

Please use this version of the responses, I have just expanded HDCH to Haringey Defend Council Housing, so that readers will know who we are.

thanks again

---

**From:** Paul Burnham <[Haringey\\_DCH@outlook.com](mailto:Haringey_DCH@outlook.com)>  
**Sent:** 13 January 2017 00:23  
**To:** [localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)  
**Subject:** Responses to Consultation on Modifications to the Local Plan

Haringey Defend Council Housing  
**Responses to Consultation on Modifications to Local Plan**

**Alterations to Strategic Policies**

**AltsMod10 Alt45 – Paragraph 3.2.1**

Amend the fifth bullet point of the paragraph to read as follows:

The need to ~~regenerate~~ undertake strategic improvement or renewal of existing ~~social council~~ housing estates

**For clarity that on a number of sites, what is being proposed is strategic improvement of the existing housing estate. Made in response to Planning Inspector's comments.**

**Haringey Defend Council Housing response:**

Estate regeneration must not mean demolition, as it does in practice at present, but must in future include proper assessment of improvement, better management, and infill development; taking proper account of the risks and uncertainties of redevelopment, including the possible loss in practice of council and social housing at Target rent, and the negative impact of higher house prices and rents for lower income households and on those with no or limited savings, or who may be in debt. The option of strategic improvement must always be on the table.

The deletion of the words social or council to describe the estates selected for densification suggests that council housing should not be unfairly targeted for densification in future. We agree.

The revisions to the Plan are strongly supported here.

**AltsMod16 Alt64 – Following paragraph 3.2.29**

Amend the subheading to read:

**Strategic Improvement or Renewal of Haringey's Housing Estates Regeneration Renewal**

**For clarity that on a number of sites what is being proposed is strategic improvement of the existing housing estate. Made in response to Planning Inspector's comments.**

**HDCH response:**

We agree that the option of strategic improvement must always be on the table in the consideration of estate issues and problems.

This revision to the Plan is strongly supported.

**AltsMod30 Glossary Amend the definition of social rented housing within the Glossary to read:**

**Social rented housing: Rented housing owned and managed by local authorities or private registered providers ~~social landlords~~. A key function of social housing is to provide accommodation that is affordable to people on low incomes. Guideline target rents are determined through the national rent regime. ~~or be provided by other bodies under equivalent rental agreements~~**

**For clarity about the definition of social rented housing. Made in response to Planning Inspector's comments.**

**Haringey Defend Council Housing response**

This revision is to be supported to clarify and focus the plan on meeting the assessed housing need of all income types in the borough, as is required by Housing policy objective 3.2:

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

The use of the term 'social housing' to include 65% and 80% market rent, even though these are unaffordable for those on average incomes in the borough, let alone those on below average incomes, has created a confused discussion over whether the developments brought forward under the Local Plan actually meet the policy objectives of really-affordable housing for people of all income and savings levels.

This modification also eliminates the possibility of social rented housing being provided by actors other than local authorities or private registered providers, and this is most welcome in helping to keep the profit makers out of not-for-profit housing.

The revisions to the Plan are strongly supported here.

**Development Management DPD**

**DMMMod20 Policy DM 11 Delete Policy DM11 Part E as follows:**

~~**Institutional investment which provides long term investment in the private rental sector (not including accommodation for students) will be supported by the Council where it meets local housing needs and is of a high quality and consistent with the policies in this Plan, including the requirement to provide affordable housing. (all deleted)**~~

**Modification arising from Examination in Public hearings**

**Haringey Defend Council Housing response**

Institutional investors in the private rental sector will make no contribution to the requirements of Housing policy objective 3.2: real housing affordability, and communities we can be proud of. The private rental sector should not be relied upon to deliver new housing in this borough. We support the deletion of this paragraph.

## **Tottenham Area Action Plan**

### **AAPMod41 SS3, TG3, NT3, NT4, NT5**

*Insert a new paragraph at the appropriate location within the 'Site Commentary' section to provide more information on the process for estate renewal as follows:*

**Insert a new paragraph at the appropriate location within the 'Site Commentary' section to provide more information on the process for estate renewal as follows:**

**The process for undertaking estate renewal will follow the following steps: - Engagement with residents across the site prior to the commencement of any proposals to inform them of what is being proposed, the process for how they will be engaged and the proposed timetable; - The establishment of Residents Steering Group; - The appointment of an Independent Advisor to help people through the process and to inform them of their right and options as tenants or leaseholders; - The appointment of an architect to begin drawing up the site masterplan in consultation with the Residents Steering Group, including capacity testing, resulting in potential development options. - The conducting of financial appraisals of the development**

**Modification arising from Examination in Public hearings.**

#### **Haringey Defend Council Housing response:**

This paragraph concerns council estates at Turner Avenue, Brunel Walk, Reynardson Court, Northumberland Park and Love Lane.

It is sad to read a proposed modification which seems predicated on the supposed inevitability that demolition and redevelopment must take place at all of these sites. This contradicts the excellent modifications made at Alt 45 and Alt 64 of the Alterations to Strategic Policies: requiring that strategic improvement must be properly considered for all the council estates affected by the Local Plan. Such basic improvements at Northumberland Park as fixing broken windows, fixing broken roof tiles in stairwells, and clearing up neglected and smelly pram sheds; or putting a concierge service into the Love Lane tower blocks, have never been properly considered by the Council.

The millions spent trying to demolish Love Lane could have been much better spent on improvements and remodelling, as well as on social support for residents and communities.

Many tenants and owners are proud of their homes and wish to remain in them.

At Turner Avenue and Brunel Walk (SS3), the Council themselves say that 'residents generally oppose redevelopment' (p 572, Cabinet reports pack, 18/10/16). At Northumberland Park, where we have canvassed for many weeks, most residents do not support demolition and more than 300 have signed petitions demanding the final say in a ballot. Because of the Council's denial of its own undeclared policy, many residents even in the centre of the demolition areas have little idea what is planned for them. Therefore, the proposed modification to AAP Alt 41 is inadequate. There should be a proper evaluation of strategic improvements as well as demolition.

Estate redevelopment schemes are controversial, and rightly so. Research has demonstrated that a loss of social housing results from most such schemes; especially since governments cut national funding for new social housing at Target Rent, after 2010, and cut funding for most new sub-market renting of any kind, after 2015.

We recommend that this section of the Local Plan should specify proper provision at all demolition sites for a decisive residents yes/No Vote on the demolition proposals, as recommended by the 'Knock it down, or do it up' report from the Housing Committee of the London Assembly, published in 2015.

We recommend that residents of all tenures must be allowed to vote in a secret ballot counted by the Electoral Reform Society or a similar organisation.

I would be grateful if you could send me an email to confirm receipt of this contribution to the Consultation.

Thanks.

Yours faithfully

Paul Burnham  
Secretary  
Haringey Defend Council Housing  
[haringey\\_dch@outlook.com](mailto:haringey_dch@outlook.com)

13/01/2017

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>