

## **Haringey Local Plan – Examination in Public**

### **Representor's Additional Statement for Tottenham Area Action Plan**

#### **OUR TOTTENHAM NETWORK - PLANNING POLICY WORKING GROUP**

**17.08.2016**

Representor reference ID:

- **Tottenham Area Action Plan Regulation 19 Representations: Representation No. 9**

**Cross-referenced with:**

- **Alterations to Strategic Policies Regulation 19 Representations: Representation No. 20: Our Tottenham**
- **Site Allocations Regulation 19 Representations: Representation No. 227: Our Tottenham**

To the EiP Inspector

Dear Ms Thornby,

Members of the Our Tottenham Planning Policy Working Group wish to draw attention to some new matters in relation to housing issues. This is the document we submitted for the July 29<sup>th</sup> deadline but with some new material included in reference to the TAAP Matters and Issues which were not available when we did the previous submission. There are also new appendices.

- **Point A** relates to all three documents and representations mentioned above (**Alterations to Strategic Policies, Site Allocations, Tottenham AAP**) as it is about the changing context following recent political change in London and in the UK. The evidence relates to the following **tests of soundness** of the plan: “Justified” and “effective” (new economic and political context has changed the evidence base re. expected trends in the housing market); and “Consistent with national policy” (changing context for the London Plan following the Mayoral Elections, with which all local plans must comply).
- **Point B** relates to Point 12 of the Inspector's Matters and Issues re. **Alterations to Strategic Policies (Policy SP2 HOUSING)** and to **Tottenham AAP**, . The evidence relates to the following **tests of soundness** of the plan: “Positively prepared” and “Justified”.
- **Point C** refers to a recent Council Cabinet decision that would impact on any matters and discussions about Estate ‘Renewal’, demolitions and redevelopment. It relates to the **Alterations to Strategic Policies (Policy SP2 HOUSING)** and to the **Tottenham AAP**, and to the following tests of soundness of the plan: “Positively prepared”, “Justified” and “Effective”.
- **Point D** relates to the Inspector’s Note 3 in the ‘issues for examination’ on the **Alterations to Strategic Policies and the Tottenham AAP** (as well as the **Site Allocations document**). The evidence relates to the following **tests of soundness** of the plan: “Positively prepared” and “Justified”.
- **Appendix 1** is a Freedom of Information Request Regarding Re-housing of Love Lane Tenants. This is included because we are we are very concerned about how Haringey Council is proposing to re-house tenants who wish to be re-housed in new housing built on the site of their demolished estates. It appears that their options are either wait on the estate waiting for the new houses to be built around them or going into temporary accommodation while they are waiting.
- **Appendix 2** is part of our response submitted to Haringey Council on March 2016 to the Tottenham Area Action Plan Regulation 19. It is text that was cut and paste into page 88-103 of Appendix 2 our detailed response on specific sites. It refers to sites NT1-5. Unfortunately the cut and paste text left out the footnotes providing sources for our information. These footnotes are reproduced here.

Thanks for giving consideration to this new evidence.

Yours sincerely,

Claire Colomb, Dave Morris, Jacob Secker, Martin Ball

- from the Our Tottenham Planning Policy Working Group

## New matters

### A. The changing context of the London Plan

Since March 4, we have at least five important changes in the political and market environment:

1) a new Mayor of London who has committed himself to modifying the London Plan in favour of a 50% affordable housing target.

2) The London Assembly on 6 July 2016 passed a motion calling on the Mayor to ensure the provision of more social rented housing, the text of which includes:-

*'This Assembly therefore calls on the Government to provide sufficient funds in future spending reviews to meet the need for new social housing in London, and calls on the Mayor to bring forward a housing budget and a revised London Plan and Housing Strategy that will continue to provide more social housing.'*

3) The Housing and Planning Act 2016 will lead to further pressure on family budgets by the 'pay to stay' policy, which will increase the demand to exercise the 'right to buy' to avoid paying high rents. It also provides for a 'right to buy' for housing association tenants which will gradually reduce the social rented housing stock even further. In this environment, now more than ever is it important to increase the social rented stock if the Borough Plan can have any hope of achieving its stated policy DM10 C ('resisting the loss of all existing housing, including affordable housing... unless...replaced with at least equivalent new residential floorspace') and the Haringey Plan's key objective as expressed in policy 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'.

4) The new Mayor is also committed to giving local residents the opportunity to buy new build housing before it is offered to foreign investors. The mechanism for this is still unclear but the effect or even anticipation of this policy is likely to steer developers in the direction of cheaper dwellings which can be sold quickly and easily to existing Londoners, in order for these developers to avoid cash flow problems and extra borrowing costs.

5) Foreign investors are showing less interest in the London residential property market following the EU referendum and house prices are already reported to be dropping, especially for luxury apartment blocks. This will surely make land cheaper in the medium term, making affordable housing easier to finance than before. However it will also mean the next few years are a bad time for the Council to sell land to raise money, implying considerable risk and uncertainty about whether large-scale estate renewal and densification schemes – implying attracting private investment to secure additional higher-value private housing within the estate envelopes - can realise the target numbers of dwellings.

The first four factors call into question the soundness of a plan based on reducing the earlier 50% affordable housing target to only 40%. The Borough plan needs to be flexible to respond to changes in the London Plan and in the changes in developers' expectations which are likely to follow. All references to 40% should be replaced by 'a proportion of genuinely affordable housing as high as possible, with a minimum of 50% as may be set by revisions to the London Plan or policies made by the Mayor and the London Assembly'. Such revision is likely to be supported by additional funding and policy measures from the Mayor, and is extremely

important in view of the fact that insufficient genuinely *affordable* housing jeopardises the attainment of the Haringey Plan's key objective as expressed in policy 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'.

Regarding factors (4) and (5) above, either may lead to some large developers encountering financial difficulty or pulling out of early-stage development proposals. The implication of the fourth and fifth factors is that the plan, to be sound, surely needs to envisage additional, alternative ways in which targets, especially for affordable housing, can be achieved. These might include methods we stated in our March submission, for example facilitating self-build and community non-profit developments; working with landlords to achieve longer tenancies and to reduce the void rate associated with frequent tenant turnover; extending existing social rented blocks by adding extra wings or floors, or building homes over car parks; buying empty and hard-to-sell homes to let to homeless families; and making it easier for owner-occupiers to obtain planning permission to extend their homes so that existing dwellings can accommodate larger families

An expectation that sale prices of homes are currently dipping, and will rise again in future, also means that it is also very important that the Council should not tolerate long delays between the grant of planning permission and the start of building, nor reduction of s.106 contributions once agreed. This clearly needs to be inserted into the strategic policies.

## **B. Point 12 of the Inspector's Matters and Issues re: Strategic Policies:**

### **(Policy SP2 HOUSING) and Tottenham AAP (Policy AAP3 HOUSING) and SS3, TG3, NT3, NT4 and NT5**

(The question is in relation to paragraph 3.2.9 concerning Housing Estate Renewal, where the third paragraph states that 'the Council...will seek to re-provide the same amount of social housing on an equivalent floor space basis'. The Inspector asks: Does this mean that in some cases the equivalent may not be able to be provided? [Alt 64]).

It also relates to the Tottenham Area Action Plan Matters and Issues: Matter 3, questions 9-11 on whether demolition of estates is appropriate and whether social housing would be replaced in the same quantity.

We would comment that evidence available from the council indicates that less social housing is likely to be provided on the Love Lane Estate than there was previously (this is the only regeneration scheme where we have the hard figures):

- There are 297 properties on the Love Lane Estate (see <http://www.minutes.haringey.gov.uk/documents/s53946/High%20Road%20West%20-%20covering%20report.pdf>, page 4).

- According to Cabinet Minutes from 14/06/2016 there are now 85 leasehold properties on the Love Lane Estate (up from the number of 78 in the above 2014 document: see <http://www.minutes.haringey.gov.uk/documents/g7843/Public%20reports%20pack%2014th-Jun-2016%2018.30%20Cabinet.pdf?T=10>, page 36). All the rest (212) are tenanted

properties. Originally they would have been council tenanted properties but with decants due to the demolition temporary residents would have moved into some of them.

- According to the Memorandum of Information for 'partners' for Love Lane only 145 social rented homes will be provided on the site (see [https://tottenham.london/sites/default/files/hrw\\_moi\\_pdf\\_1.pdf](https://tottenham.london/sites/default/files/hrw_moi_pdf_1.pdf)).

- So only just over 2/3rds of social housing is getting re-provided.

- If it is argued that the 'missing' social housing will be provided on another site, this begs the question of additionality; that site might in any case have been used to augment the social rented stock even if the first site had never even existed. Re-provision should only be counted on the same estate or if it is obtained by transfer of land and buildings from a use other than social rented housing where that use clearly would not have happened otherwise. Without this proviso that the 're-provision' must be truly additional, the policy is meaningless. A valid example would be where private rented homes are brought into ownership of a social landlord and re-let on social housing terms; or where a developer specifically buys Site B in order to re-provide social rented dwellings which are being demolished or changed to another use on Site A in which his company is also involved; and no other proposals to build social rented homes on Site B had come forward at the time.

### **C. Estate 'Renewal' and the Haringey Cabinet drive to abandon any guarantees on tenants' rights in demolition areas**

#### **Strategic Policies (Policy SP2 HOUSING)**

#### **Tottenham AAP (Policy AAP3 HOUSING) and SS3, TG3, NT3, NT4, NT5**

Cabinet has just approved a disastrous estate renewal strategy, even worse than the one that was consulted on:

<http://www.minutes.haringey.gov.uk/documents/g7844/Public%20reports%20pack%2012th-Jul-2016%2018.30%20Cabinet.pdf?T=10>

Page 50 on not giving even Council secure tenants a right to return to newly built housing if our estates are demolished:

*'When the scheme design has been agreed and costed, it may be possible to provide a right of return for example in schemes where it is possible to build sufficient numbers of affordable units of the right size in the same location. However, where the costs of the scheme cannot be met, then additional units for sale may need to be considered, which will reduce the available number of units for rent of the size required by the population on the estate.'*

*6.7 The same consideration will have to be applied to the number of shared ownership or equity units available for leaseholders in the development of the scheme. Although best endeavours will be made to provide a home ownership unit in the same location for existing leaseholders on the estate, it may be the case that this cannot be guaranteed.'*

In relation to re-housed residents on areas re-developed by joint ventures:

*'If the provider of the replacement homes is the Haringey Development Vehicle (HDV), then the Council will seek to match the tenure and rent level that the tenant currently has, but this is dependent on negotiations with the HDV partner which have not been concluded.'*

Also see page 63:

*'The Council is committed to enabling communities who wish to do so, to remain together. The Council will endeavour to ensure tenants have the right to return but this may not always be possible and so this is a matter that will be discussed with affected tenants and residents as part of the communications plan on a scheme by scheme basis.'*

and page 64:

*'The Council agrees that the package of measures offered to tenants and leaseholders in the estate renewal scheme at High Road West is relatively generous. This is a small scheme affecting around 200 tenants. However, forthcoming schemes are likely to be much larger, and It would be difficult to provide such a package of measures again as it would be likely to make estate renewal schemes less viable financially. It is not proposed to offer exactly the same package in all future estate renewal schemes. There are key elements of the proposed arrangements which will be a matter of a decision on a scheme by scheme basis; these issues will themselves be subject to consultation on a scheme by scheme basis, when the design and costs of the individual scheme are known.'*

Page 65: Comparing the target rent guarantee for High Road West residents with the guarantees for people re-housed in subsequent schemes:

*'[High Road West] Rent guarantee – The Charter says ‘you will continue to pay a social rent’ [Other schemes] The proposed policy does not offer a rent guarantee, but says that the Council is committed to keeping rents affordable.'*

On a slightly different but very related note you might want to see the kind of rent levels the council thinks are ‘affordable’ for the small number of new council homes they are building (same web reference as above page 171):

<i>Bedrooms</i>	<i>Target rent</i>	<i>Revised Rent</i>	<i>(Draft Housing Strategy)</i>
<i>1</i>	<i>£88.29</i>	<i>£213.50</i>	
<i>2</i>	<i>£104.75</i>	<i>£228.00 – £302.33</i>	
<i>3</i>	<i>£120.06</i>	<i>£206.25 – £302.46</i>	
<i>4</i>	<i>£136.41</i>	<i>£311.54</i>	
<i>5</i>	<i>£157.82</i>	<i>£342.69</i>	

Refusing to offer right of return and offering no target rent guarantee is totally unacceptable. In addition families in Haringey cannot afford £300 a week for council homes.

This policy has been approved by Cabinet but the Full Council has not done yet and does not meet again until November. It is also worth noting that the huge rents proposed above are totally against Sadiq Khan's pledge that social housing rents will be no more than one third of average household take-home pay for the area. Most households in Haringey are not taking home £900 a week.

In addition we are very concerned about how Haringey Council is proposing to re-house tenants who wish to be re-housed in new housing built on the site of their demolished. It appears that their options are either wait on the estate waiting for the new houses to be built around them or going into temporary accommodation while they are waiting. This is confirmed in the reply to a Freedom of Information Request made by Jacob Secker regarding Love Lane (see Appendix 1). This is unacceptable as residents will be very unlikely to want to either live on a building site for years or move into temporary accommodation. The more sensible option would have been to allow them to move into new permanent accommodation with the option to move back onto the new estate when it is completed. This however has been ruled out as the response shows.



## **D. Inspector's Note 3 in the 'issues for examination' on Alterations to Strategic Policies**

**(also Site Allocations document and Tottenham Area Action Plan- Tottenham AAP (Policy AAP3 HOUSING) and SS3, TG3, NT3, NT4, NT5 )**

We are concerned that where developers offer to build more than the estimated site capacity mentioned in the DPD, this may sometimes be through undesirably high densities, leading to loss of green space within sites, or buildings which are too high to have regard for the amenity of surrounding areas. An example of this is SA60, where 70 dwellings are envisaged in the DPD but the developers are now proposing 134. This involves blocks up to 5 storeys, which residents argue are out of keeping with the surrounding 2-3 storey terraced homes. They also fear that such high buildings will adversely affect the park next to the site. We think that the number of dwellings on each of the DPD sites, where such a development is acceptable, should not exceed say 10% more than the number stated in the DPD unless three conditions are met; (1) that a greater number facilitates an increase in the total stock of genuinely affordable rented dwellings (2) that local residents support this number (3) that all other development management policies can be met with the larger number.

### **Appendix 1. Freedom of Information Request Regarding Re-housing of Love Lane Tenants**

**Dear Mr Secker,**

**Re: Freedom of Information Act Request ref: LBH/5502416**

**Thank you for your request for information received on 19th July 2016, in which you asked for the following information:**

**1) If council tenants in the Love Lane estate choose to be re-housed in other social housing in the coming period will they have the right to move from these other properties to the new properties on Love Lane when these become available?**

**2) If so what provision has been/will be made to inform them of this fact?**

**3) If this will not happen how exactly would a council tenant who wanted to be re-housed on Love Lane get re-housed there?**

**4) Would they go into temporary accommodation while the new housing is being built?**

**My response is as follows;**

**As set out in the Secure Tenant Guide, all Secure Council Tenants living on the Love Lane Estate can choose whether they would like to be re-housed in a new home in the regeneration area or bid and move to alternative permanent accommodation elsewhere in the borough.**

**Secure Council Tenants who choose to move to alternative permanent accommodation will not have the option to return.**

**If Secure Council Tenants wish to remain in the High Road West area they will be able to do so. The phasing principles set out in the Secure Tenant Guide explain that the Council will be working with the future development partner and residents to develop a final phasing plan and that the phasing plan will;**

- Seek to ensure residents have one move only- from their current home, into their new home, and that;**
- Temporary moves may be required but we will aim to minimise these.**

**Each Secure Council Tenant on the Love Lane Estate Lane has a dedicated Re- housing Officer to support them through the move process. The Re- housing Officer will ensure that the tenant is fully informed of the re- housing process and the High Road West programme, including any requirement for temporary accommodation.**

**If you have any further queries, or are unhappy with how we have dealt with your request and wish to make a complaint, please contact the Feedback and Information Team as below. (Please note you should do this within two months of receiving this response.)**

**Feedback and Information Governance Team**

**River Park House**

**225 High Road**

**N22 8HQ**

**T 020 8489 1988**

**E FoI@haringey.gov.uk**

**Yours sincerely,**

**Sheila Miranda**

**Senior Re-housing Officer**

**From: Gunn Claire1**  
**Sent: 20 July 2016 10:47**  
**To: 'jacobsecker@aol.com'**  
**Subject: RE: FOI request -regarding rehousing of residents whose homes are to be demolished, Reference LBH/5502416**

**From: jacobsecker@aol.com [mailto:jacobsecker@aol.com]**  
**Sent: 19 July 2016 01:55**  
**To: FOI**  
**Subject: FOI request -regarding rehousing of residents whose homes are to be demolished**

**Dear Freedom of Information Team**

**I wish to follow up my previous inquiry regarding this matter with an information request regarding the issue below please. As per the law on freedom of information, please can you provide me with information from written policies, plans or the minutes of meetings where decisions on this issue have been made or anything else you have in writing or which has been recorded which will provide me with information that answers the following question.**

**If council tenants in the Love Lane estate choose to be re-housed in other social housing in the coming period will they have the right to move from these other properties to the new properties on Love Lane when these become available? If so what provision has been/will be made to inform them of this fact? If this will not happen how exactly would a council tenant who wanted to be re-housed on Love Lane get re-housed there? Would they go into temporary accommodation while the new housing is being built?**

**(I am not asking for information regarding my 2nd question below as this has already been answered in the negative by the Cabinet in July.)**

**Regards**

**Jacob Secker**  
**69 Tangmere, Willan Road, London N17 6NB**  
**07596 880156**

**-----Original Message-----**

**From: Lovell Sarah <Sarah.Lovell@haringey.gov.uk>**  
**To: jacobsecker <jacobsecker@aol.com>**  
**CC: FOI <TeamInbox.FOI@haringey.gov.uk>**  
**Sent: Tue, 23 Feb 2016 19:37**  
**Subject: FW: FOI request - LBH/4996216 Secker**

**Dear Mr Secker,**

**Re: Freedom of Information Act Request ref: LBH/4996216**

**Thank you for your request for information received on 02 February 2016, in which you asked for the following information:**

- 1. Have all tenants in phase 2 been told they have the right to be re-housed in new housing on the newly built homes in the High Road West Regeneration scheme area when they are built?**
- 2. If so have they been told they will be offered permanent tenancies and social housing 'target rents' in these new properties?**
- 3. If the answer to 1 is yes, how many of these tenants have indicated they want to move into new housing on the High Road West site once it is built?**

**My response is as follows:**

**Please see the link below to the Love Lane Secure Tenant Guide, which holds the answers to the questions you have raised. This Guide was developed in consultation with the Love Lane Resident Association and their Independent Tenant and Leaseholder Advisor. It formed part of the Section 105 consultation with Love Lane residents, which took place between September and October 2014.**

**All secure council tenants in phase 1 and 2 have been given and have been consulted on this document.**

**<http://www.haringey.gov.uk/regeneration/tottenham/tottenham-regeneration/high-road-west>**

**The Council is still in the process of completing housing needs assessment with tenants in phase 2. The housing need assessment focuses on tenants' rehousing need and explaining tenants' rehousing options. We do not hold a definitive list/number of tenants who wish to be rehoused within the development. At this stage, many tenants just want to know and consider their options, as well as have the ability to start bidding for properties, so that they can maximise their housing choices.**

**If you have any further queries, or are unhappy with how we have dealt with your request and wish to make a complaint, please contact the Feedback and Information Team as below. (Please note you should do this within two months of receiving this response.)**

**Feedback and Information Governance Team**

**River Park House**

**225 High Road**

**N22 8HQ**

**T 020 8489 1988**

**E FoI@haringey.gov.uk**

**Yours sincerely,**

**Sarah Lovell**

**Area Regeneration Manager**

**From: jacobsecker@aol.com [mailto:jacobsecker@aol.com]**

**Sent: 01 February 2016 22:12**

**To: FOI**

**Subject: FOI request re. Love Lane estate re-housing**

**Dear Feedback and Governance**

**My enquiry is about the Public Reports Pack for the Cabinet Agenda of 15/12/15 , Item 15 'High Road West Regeneration Scheme Update and Next Steps'**

**My enquiry concerns the re-housing of council tenants in newly built homes on the High Road West site. Specifically I refer to paragraph 6.46 of this section:**

**'6.46 The council has undertaken to offer replacement homes to all those tenants**

**who wish to remain in the area, however, it is clear that some tenants do not wish to stay and have other aspirations to move elsewhere. Phase 1 of the rehousing process has resulted in 29 tenants moving locally (to Ambrose and Mallory Court) and, a smaller number, moving elsewhere in the borough. To**

**inform the future replacement housing requirement and to understand residents' rehousing needs and aspirations, the High Road West Rehousing Officers have been completing outline needs assessments with tenants in phase 2 of the Love Lane Estate. It is clear from the needs assessments that tenants in phase 2 would like the opportunity to bid and move to homes now.'**

**My questions are:**

- 1. Have all tenants in phase 2 been told they have the right to be re-housed in new housing on the newly built homes in the High Road West Regeneration scheme area when they are built?**
- 2. If so have they been told they will be offered permanent tenancies and social housing 'target rents' in these new properties?**
- 3. If the answer to 1 is yes, how many of these tenants have indicated they want to move into new housing on the High Road West site once it is built?**

**Yours sincerely**

**Jacob Secker  
69 Tangmere  
Willan Road  
London N17 6NB  
07596880156**

**Appendix 2**

**Our Tottenham Response to Tottenham Area Action Plan Pre-Submission  
Version March 2016 North Tottenham Neighbourhood Area and NT1-5 [with  
footnotes]**

### **Introduction**

Our Tottenham regards the plans set out in NT1-5 in their entirety as plans for wholesale demolition of council housing and its replacement with mainly private housing. We note in this connection the Council's plans as set out in the Northumberland Park Masterplan of February 2015 which envisages three scenarios for the NT4 Northumberland Park area, all of which involve the demolition of the majority of the council housing in the area.<sup>1</sup> The scenarios 9.2-9.5 all specify only a small number of council homes to be 'retained' with the others in the area clearly on a demolition list. We believe the Masterplan reflects the Council's current thinking on the

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<sup>1</sup> Fletcher Priest Architects *Northumberland Park Strategic Framework Report* February 2015, pages 104-111  
[http://www.haringey.gov.uk/sites/haringeygovuk/files/masterplanframeworkreport\\_final\\_compressed.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/masterplanframeworkreport_final_compressed.pdf)



desirability of demolitions. If the Council has changed its mind on this issue it should state so publicly and unequivocally. If the Council has changed its mind about the Masterplan proposals then there is no need for the Site Allocations NT3-5 as it is not necessary to include areas as site allocations if refurbishment not demolition is what is needed. We believe that these plans are inappropriate and unsound as they will reduce the quantity of social housing in Haringey and they are discriminatory as they will have a worse adverse impact on the black community when compared to other groups. We propose that improvement to the existing homes rather than demolition is the most appropriate course of action. We believe this can be achieved by removing the 'red zone' site allocations from areas in NT3, NT4 and NT5 and improving buildings in these areas, not demolishing them. The material below is the evidence we wish to cite in support of our objections to policies NT1-5 and the site allocations in NT3, NT4 and NT5 as well as evidence for our alternative.

### **North Tottenham Neighbourhood Area**

At 5.91 the *Action Plan* states:

'The area suffers from poorly defined and underutilised public and private spaces that are not always well looked after.'<sup>2</sup>

If public spaces are not well-looked after, then the Council should improve its custodianship of these areas. The scenarios set out in the Northumberland Park Masterplan for the demolition of over a thousand council properties (tenanted and leasehold) is a grossly disproportionate response to this problem. The demolition is also a grossly disproportionate response to the issue of North-South road links.

5.92 states:

'The southern part of the area is predominantly characterised by local authority housing estates which were built in the 1960s. These have very poor street and block layouts, with a lack of connections and fragmented networks.'<sup>3</sup>

Mass demolition is a totally disproportionate response to a problem that is not described with any specificity here. High density developments produce much worse spatial problems with narrow pedestrianized areas without sunlight between very closely built blocks as in Hale Village. But NT3-5 envisages a huge increase in housing density in terms of increases in net residential units.

### **NT 1**

A large amount of social housing lives within a ten minute walk of Northumberland Park including Kenneth Robbins House and the surrounding small blocks, Robert

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<sup>2</sup> *Tottenham Area Action Plan. Pre-Submission Version.* January 2016, page 90.

<sup>3</sup> *Ibid.*

Burns House, Charles Bradlaugh House, Haynes Close, Waverley Road, Rothbury Walk, Scotswood Walk, Blaydon Close and Trulock Court.

It is true that many but certainly not all of the people who live in these blocks have below average incomes. However, putting their homes in Site allocations which will enable developers to demolish their homes will not benefit them at all. It is highly unlikely (see below) that most of them will be re-housed in the area. This means they will not benefit from the advantages of easy access to central London from the new Crossrail link in terms of work opportunities. Allowing these tenants to remain in the area with the Crossrail link will be a much better alternative to including their homes in Site Allocations NT3 and NT4. The only way to make this policy sound is to prevent demolitions and remove the council estates from Site Allocations.

### **NT3 and 4**

5.111 states:

‘The Northumberland Park North area will benefit from public transport improvements at both White Hart Lane and Northumberland Park stations, along with the redevelopment of the Tottenham Hotspur FC stadium. At present the estate suffers problems linked to low socioeconomic levels, lack of site permeability, and an unbalanced housing stock with an overbalance of small, socially rented stock.’<sup>4</sup>

In the context of the Northumberland Park Masterplan's scenarios for mass demolitions of council housing it is obvious that the large amount of social housing or ‘unbalanced housing stock with an overbalance of small, socially rented stock’ is seen as a problem by the Council rather than a reasonable response to the level of housing need in the area.

The Council’s response to this alleged problem is:

‘Redevelopment will create more, new, and better housing with greater diversity of scale, size, tenure and type.’<sup>5</sup>

The Council’s uniquely targeted approach to social housing estates as needing the insertion of private housing to create ‘diversity of...tenure’ is blatant discrimination against local people on the basis of their economic status. This approach is quite rightly not being used to criticise streets of predominantly owner occupiers by claiming they are in need of social housing to make a ‘mixed and balanced community’. All such references and bias against social and council housing should be removed from all Council documents as untrue, biased and discriminatory. This approach is clearly a cover to try to justify the sell-off or use of some Council land cheaply to property developers, and to justify the increasing abandonment of the need to address the

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<sup>4</sup> Ibid. page 99.

<sup>5</sup> Ibid. page 101.

needs of local people for more (not less) social housing as the only genuinely affordable and secure housing for thousands of residents.

5.114 states:

‘Comprehensive masterplanned improvement of the area to improve existing, and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include: the provision of additional high quality housing with an increased range of types, sizes, and tenures; improvements to existing housing stock; new public spaces; and new community infrastructure.’<sup>6</sup>

We believe that the Council will not be able to reprovide genuinely affordable housing in the Northumberland Park area if its plans for mass demolitions go ahead.

The *Northumberland Park Strategic Framework Report* (i.e. the ‘Masterplan’) only provides for the preservation of a very small percentage of the existing council homes in any of the scenarios. Even in the ‘Minimal Intervention’ scenario<sup>7</sup> only 183 council homes are preserved with 1154 council homes (909 tenanted and 245 leasehold) being demolished. It is therefore dishonest to argue that good quality homes will be preserved when actually the emphasis is on mass demolition and new provision of mainly high density non-social housing. Nowhere in the *Northumberland Park Strategic Framework Consultation Report*<sup>8</sup> does it indicate that the residents of Northumberland Park were told by any representative of the Council that the Council’s plans would mean the mass demolition of council housing. It is grossly unacceptable to consult about a regeneration plan without informing residents of the scale of demolitions contemplated. Our Tottenham therefore believes that a lawful consultation into the demolition of such a large quantity of council housing has not taken place. The Site Allocations NT3-5 are therefore unsound and all council housing should be removed from them. Instead the refurbishment of council estates should be carried out which does not require inclusion in Site Allocations in the Local Plan.

### **Northumberland Park Joint Venture**

We are very concerned that the proposal to build new housing in Northumberland Park on the site of existing estates in fact bears no relation to local people’s aspirations but could actually facilitate wholesale demolition and rebuilding. We find evidence of this in the proposed *Alterations to Haringey’s Adopted Strategic Policies 2011-2026*. Alteration 53 sets out an initial list of housing estates to be ‘regenerated’. Northumberland Park is one of the estates set out here. The reason box for Alteration 53 states that the alteration:

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<sup>6</sup> Ibid., page 100.

<sup>7</sup> *Northumberland Park Strategic Framework Report*. Page 104.

<sup>8</sup> George Cochrane Associates Ltd. *Northumberland Park Strategic Framework Consultation Report*  
[http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland\\_park\\_consultation\\_report\\_0.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland_park_consultation_report_0.pdf)

'Recognises the Council's commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of Council-owned homes.'<sup>9</sup>

The Council has stated clearly their desire for the 'regeneration' of Northumberland Park to take place through a 'Development Vehicle'.<sup>10</sup>

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

'is unlikely to be a refurbishment vehicle, and transfer would most likely be on the basis of decanting tenants and potentially offering them the opportunity to return.'<sup>11</sup>

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

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

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

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

'At present local authority controlled companies can hold property exempt from the right to buy, but the government has signalled its intention to remove this exemption. This will leave joint venture vehicles, part owned by the private sector as the only

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<sup>9</sup> *Alterations to Haringey's Adopted Strategic Policies 2011-2026. Pre-Submission Version*. January 2016.

[http://www.haringey.gov.uk/sites/haringeygovuk/files/06\\_haringey\\_strategic\\_policies\\_dtp\\_221215.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/06_haringey_strategic_policies_dtp_221215.pdf) Page 17.

<sup>10</sup> *The Future of Housing Review-Conclusions and Recommendations* Report to Cabinet 4.9.15 in *Agenda Packs*

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

<sup>11</sup> *Ibid.*

mechanism whereby properties can be protected for social use. These will however, not be secure tenancies; but rather private rented properties let at secure or affordable rents.’<sup>12</sup>

The Haringey Council Cabinet approved the establishment of a ‘Development Vehicle’ on 10/11/2015 on a Joint Venture model and tendering is now taking place.<sup>13</sup>

Therefore if there is new development on the estates, the tenants will only be given the option of return if they want to swap a secure, council tenancy for an insecure private tenancy. Given that virtually no tenants will want to do that, our only real option will be to accept a move onto another housing estate in Haringey. The existing residents of Northumberland Park will gain nothing from such a policy.

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

‘The Council will aim to offer secure tenants the option of returning to a new permanent home on their estate where possible, on a scheme by scheme basis.’<sup>14</sup>

There is absolutely no guarantee that council tenants will be rehoused in the new homes on Northumberland Park. It is likely that they will just be put on the list to be transferred to other council estates in Haringey as seems to be happening to most of the Love Lane tenants (see below.) It is therefore clear that most of the council tenants in Northumberland Park have no real interest in the demolition of their homes and refurbishment not demolition should occur.

The only way to retain affordable housing in the area is not to knock down council estates in the first place. As the Our Tottenham Guiding Principles state, sites consisting of mostly viable buildings should not be earmarked for demolition. The council estates in Northumberland Park are viable and the provision of new high density estates with much less social housing will be disastrous, not an improvement. **Refurbishment does not require inclusion of areas NT3-5 on a site allocation therefore all council estates should be removed from the site allocations included in the Tottenham Area Plan.**

### Equalities

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<sup>12</sup> *Final Report of Independent Advisor to the Future of Housing Review*. September 2015.

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

<sup>13</sup> See for example: <http://www.gva.co.uk/news/HaringeyseeksJVpartnerfor2bnestatesregeneration/>

<sup>14</sup> *Estate Renewal and Rehousing and Payments Policy*

[http://www.haringey.gov.uk/sites/haringeygovuk/files/estate\\_renewal\\_rehousing\\_and\\_payments\\_policy\\_-\\_final\\_draft.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/estate_renewal_rehousing_and_payments_policy_-_final_draft.pdf) Page 7

In support of our core view on improvement not demolition we present the following evidence regarding equalities. 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>15</sup>

We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory, given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year. <sup>16</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>17</sup> In the

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<sup>15</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)

<sup>16</sup> *Ibid.* Page 58.

<sup>17</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.

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>18</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>19</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.

### **Height of Housing Proposed in Regenerated Area and Gardens.**

The Northumberland Park Masterplan- the *Northumberland Park Strategic Framework Report* states<sup>20</sup> that new homes in the area will be between 3-10 stories. Our Tottenham believes that Tottenham's existing pattern of low-rise housing (2-3 stories) in residential suburban development should be respected. The high-density plans for Northumberland Park sound nightmarish.

It is clear that the whole process of developing the plan for Northumberland Park has used very misleading language. The *Northumberland Park Strategic Framework Consultation Report* suggests that respondents wanted homes with gardens to be built<sup>21</sup>. The 'traditional street pattern principle here seems to relate to such aspirations. The high-density plans, however, are clearly about housing most residents in blocks not

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<sup>18</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>19</sup> *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C, page 5.*

<sup>20</sup> *Northumberland Park Strategic Framework Report. Page 97.*

<sup>21</sup> *Northumberland Park Strategic Framework Consultation Report. Page 6.*

houses (see the plan for the new blocks on page 97 of the Strategic Framework Report.)<sup>22</sup> The gardens referred to are therefore communal which is not what most residents imagined when they agreed with an aspiration for homes with gardens. Existing council estates have communal gardens. The 'home with a garden' promise appears to have been used to deceive residents into supporting Council demolition plans. Again it is clear that the alleged consent of local residents to the Council's regeneration plans is not informed consent.

## **NT5**

The plans for the new housing in the High Road West area completely contradict the results of the Council's own survey and, we believe they are therefore unlawful. The *High Road West Consultation Feedback Report* of August 2013 clearly states that respondents on the Love Lane estate want 'traditional homes with gardens, built to low density'<sup>23</sup>. Love Lane residents are clear they do not want high rise blocks being built<sup>24</sup>. The *Consultation Feedback Report* is quite clear that residents in the wider High Road West area did not want high-rise residential blocks, preferring low rise blocks of 3-5 stories. The *Tottenham High Road West Masterplan Framework* indicates clearly, however, that there is an intention to build a large number of urban blocks at 5-6 levels and towers at 12-14 levels<sup>25</sup>. 12-14 levels is higher than any of the council blocks currently in the High Road West area (the highest currently being 3 towers which are ten levels.) It is quite clear that the High Road West plans completely contradict the wishes of the residents as expressed in the consultation documents.

The *High Road West Consultation Feedback* states clearly that Love Lane residents wanted to remain as Council tenants<sup>26</sup>. No scheme has ever been identified by the council that might have allowed all Love Lane residents to come back into new properties on the existing site as council tenants. Indeed policy towards rehousing Council tenants has always been the opposite. After the Love Lane consultation the Council made the following policy statement:

'...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic options [sic], and even then, will require significant public

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<sup>22</sup> *Northumberland Park Strategic Framework Consultation Report*. Page 97.

<sup>23</sup> *High Road West Consultation Feedback Report* Page 32, 33 and 37

[http://www.haringey.gov.uk/sites/haringeygovuk/files/final\\_hrw\\_consultation\\_feedback\\_report\\_-28th\\_oct\\_2013.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/final_hrw_consultation_feedback_report_-28th_oct_2013.pdf)

<sup>24</sup> *Ibid.* page 37.

<sup>25</sup> *Tottenham High Road West: Masterplan Framework*, [https://issuu.com/haringeycouncil/docs/140912-hrw\\_masterplan\\_report\\_final\\_](https://issuu.com/haringeycouncil/docs/140912-hrw_masterplan_report_final_) Page 148 and 152 for example.

<sup>26</sup> *High Road Consultation Feedback* Page 33.



subsidy may require flexible application of normal planning policy expectations for affordable housing provision.’<sup>27</sup>

We accept that this statement is missing from the new version of this document. However, the new proposal for Northumberland Park is for the building of new housing by a Joint Venture. As noted in our response to the ‘Key Objectives for Northumberland Park section (above) the Joint Venture scheme being proposed for Northumberland Park will provide private tenancies not Council tenancies.

In addition we must note that still in 2016, 4 years after consultation with the residents of Love Lane began, no concrete plans are in place to re-house Love Lane residents in newly built homes on the Love Lane site. We cite in evidence for this the result of a Freedom of Information request made by Jacob Secker regarding this issue (see Appendix for a copy of the full correspondence.) As of 23/02/2016 the Council does not have a list of those who want to be re-housed on the site of the existing Love Lane estate. This indicates that there is no clear plan for rehousing tenants in the new housing. We believe that without such a plan demolition should not go ahead. This is because the alleged agreement of Love Lane residents to demolition was predicated on promises that they would be re-housed in the new housing.

The Council should never have let the residents of Love Lane believe that new council homes would be built on the Love Lane site if they went along with the demolition of existing homes. Consulting on something that the Council was never going to let happen without making this clear to residents was dishonest and invalidates the results of the consultation. We believe this was unlawful. It is clearly inappropriate and was a fairly underhand way of convincing the residents that the alternative of refurbishment not demolition for the Council homes on this site was not something that needed to be considered as they would all be getting new, homes with better facilities anyway. Given that the latter is not true the whole basis for demolition and including the Love Lane estate as a site allocation is fatally undermined and the Love Lane should therefore not be included in this site allocation. Plans for refurbishment should be advanced rather than demolition. The Council should be honest about the chances of Love Lane residents being re-housed in proposed new buildings on the site and be honest about whether they will have Council, permanent secure tenancies and their rent levels if they do move to the new housing. Once honest information has been given residents of the estate could have been balloted on whether they want refurbishment or demolition.

### **Shopkeepers on Tottenham High Road Facing Demolition as Part of NT5**

Given low property values on Tottenham High Road, traders are very concerned that the money they receive for their shops will not pay for the cost of starting up another business in London. Haringey Council must make a commitment to paying compensation to any displaced shop-owners that will enable them to do this. Our

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<sup>27</sup> *Alterations to Haringey’s Adopted Strategic Policies 2011-2026*, dated February 2015, page 27

Tottenham has worked extensively with the affected traders who have demonstrated and petitioned against the proposals to demolish their businesses.

**Appendix 1 Freedom of Information Request Regarding Re-Housing of Love Lane Residents.**

Dear Mr Secker,

**Re: Freedom of Information Act Request ref: LBH/4996216**

Thank you for your request for information received on 02 February 2016, in which you asked for the following information:

1. Have all tenants in phase 2 been told they have the right to be re-housed in new housing on the newly built homes in the High Road West Regeneration scheme area when they are built?
2. If so have they been told they will be offered permanent tenancies and social housing 'target rents' in these new properties?
3. If the answer to 1 is yes, how many of these tenants have indicated they want to move into new housing on the High Road West site once it is built?

My response is as follows:

Please see the link below to the Love Lane Secure Tenant Guide, which holds the answers to the questions you have raised. This Guide was developed in consultation with the Love Lane Resident Association and their Independent Tenant and Leaseholder Advisor. It formed part of the Section 105 consultation with Love Lane residents, which took place between September and October 2014.

All secure council tenants in phase 1 and 2 have been given and have been consulted on this document.

<http://www.haringey.gov.uk/regeneration/tottenham/tottenham-regeneration/high-road-west>

The Council is still in the process of completing housing needs assessment with tenants in phase 2. The housing need assessment focuses on tenants' rehousing

need and explaining tenants' rehousing options. We do not hold a definitive list/number of tenants who wish to be rehoused within the development. At this stage, many tenants just want to know and consider their options, as well as have the ability to start bidding for properties, so that they can maximise their housing choices.

If you have any further queries, or are unhappy with how we have dealt with your request and wish to make a complaint, please contact the Feedback and Information Team as below. (Please note you should do this within two months of receiving this response.)

Feedback and Information Governance Team

River Park House

225 High Road

N22 8HQ

T 020 8489 1988

E [Fol@haringey.gov.uk](mailto:Fol@haringey.gov.uk)

Yours sincerely,

Sarah Lovell

Area Regeneration Manager

**From:** [jacobsecker@aol.com](mailto:jacobsecker@aol.com) [<mailto:jacobsecker@aol.com>]

**Sent:** 01 February 2016 22:12

**To:** FOI

**Subject:** FOI request re. Love Lane estate re-housing

Dear Feedback and Governance

My enquiry is about the Public Reports Pack for the Cabinet Agenda of 15/12/15 , Item 15 'High Road West Regeneration Scheme Update and Next

Steps'

My enquiry concerns the re-housing of council tenants in newly built homes on the High Road West site. Specifically I refer to paragraph 6.46 of this section:

'6.46 The council has undertaken to offer replacement homes to all those tenants who wish to remain in the area, however, it is clear that some tenants do not wish to stay and have other aspirations to move elsewhere. Phase 1 of the rehousing process has resulted in 29 tenants moving locally (to Ambrose and Mallory Court) and, a smaller number, moving elsewhere in the borough. To inform the future replacement housing requirement and to understand residents' rehousing needs and aspirations, the High Road West Rehousing Officers have been completing outline needs assessments with tenants in phase 2 of the Love Lane Estate. It is clear from the needs assessments that tenants in phase 2 would like the opportunity to bid and move to homes now.'

My questions are:

1. Have all tenants in phase 2 been told they have the right to be re-housed in new housing on the newly built homes in the High Road West Regeneration scheme area when they are built?
2. If so have they been told they will be offered permanent tenancies and social housing 'target rents' in these new properties?
3. If the answer to 1 is yes, how many of these tenants have indicated they want to move into new housing on the High Road West site once it is built?

Yours sincerely

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69 Tangmere  
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07596880156

