

**Haringey Council Local Plan Consultation
ALTERATIONS TO STRATEGIC POLICIES 2011-2026 (formerly the Core Strategy)**

**RESPONSE BY THE *OUR TOTTENHAM* NETWORK
PLANNING POLICY WORKING GROUP
27th March 2015**

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1. INTRODUCTION

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.

The **Our Tottenham Planning Policy Working Group** is active on behalf of the **Our Tottenham network**. **Organisations** affiliated to the network include (as of 23.3.2015): 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, Dowsett estate Residents Association, Efiba Arts, 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, Lordship Rec Eco-Hub Co-op, N. London Community House, Peoples World Carnival Band, Selby Centre, Taxpayers Against Poverty, 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 Cttee, Tottenham Constitutional Club, 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.

This response, formulated by the **Our Tottenham Planning Policy 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/>) and updated in October 2014 following our third Community Conference. All the materials produced by the **Our Tottenham network** are available on our website.

2. OVERALL CONCERNS ABOUT THE CONSULTATION PROCESS

Before entering into substantive considerations in the subsequent sections of this response, we would like to express grave concerns about the consultation process on the 4 Local Plan documents which took place in February-March 2014:

- **Alterations to the Strategic Policies (DPD)**
- **Draft Development Management Policies (DPD): Preferred Option**
- **Draft Site Allocations (DPD): Preferred Option**
- **Draft Tottenham Area Action Plan: Preferred Option**

We wrote a formal letter of complaint about various flaws in the process to Cllr Ali Demirci, Mr Stephen Kelly and the LDF team - LBH Planning on 25th March 2015, after extensive discussion with various community group representatives. We called for the consultation to be halted and re-scheduled on the grounds explained in the letter below.

As we approach the end date for the consultation period on Haringey Council's planning policies and related documents I write from the Our Tottenham Planning Policy Working Group (active on behalf of the Our Tottenham Network) to request that the consultation be halted and re-scheduled because the process is fundamentally flawed.

We have done our best to publicise and explain the consultation process to all our contacts throughout Tottenham, despite our lack of resources and capacity and the extremely challenging material we are encouraging public responses to. However, despite our best efforts, we have found this an impossible task to do effectively for the reasons set out below.

Call for a fair and lawful consultation

Haringey Council's Consultation Charter states that the Council undertakes consultations *"so that people who live and work in the borough have a say in the Council decision making process and know that their views have been taken into account."*

In the recent Moseley judgement against Haringey Council by the Supreme Court the judges set out the conditions for fair consultation. These are: *" First, that consultation must be at a time when proposals are still at a formative stage. Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Third,... that adequate time must be given for consideration and response and, finally, fourth, that the product of consultation must be conscientiously taken into account in finalising any statutory proposals. "*

The Supreme Court unanimously agreed that the Council acted unlawfully by not telling local people what all the options were [regarding consultation over planned Council Tax charges], misleadingly implied that there were no possible alternatives, and gave no information about why they had decided to implement their planned new system targeting the borough's poorest residents rather than spreading the burden more evenly across all residents. The consultation had made it seem that the Council had no choice, which was incorrect, and was so unfair that the Court declared it to be unlawful.

Fundamental flaws in the current consultation

We argue below that this current consultation breaches all the four conditions set out by the Supreme Court, and the Council's own Consultation Charter. In making this formal complaint we provide the following evidence of how the consultation has been flawed in engaging residents in the decision-making process and outline the concerns collated in comments from many organisations in the Our Tottenham network.

1. A version of the latest draft Site Allocations document was submitted during the previous statutory consultation process in 2010 - this process culminated in the Examination In Public for the Haringey Local Plan. On 25th June 2010, the Haringey Federation of Residents Associations objected that the then consultation over proposed Sites was 'Not Compliant or Unsound' for the following reasons:

a. We have reviewed the entire document and find that the information provided is so incomplete and inconsistent from site to site that coherent response is not possible.

b. As a minimum the site diagrams should be to a constant scale, indicate North points, all road and street names be clearly labelled, building numbers shown, and adjacent sites in the same ownership identified.

c. The Local Authority should also have adequately researched the ownerships and made clear that all building owners and residents of these sites have already been informed of the Local Authority's proposals with regard to them.

d. We would wish to comment on each site when a coherent document is available.

As a result of these complaints made by the HFRA and others at the Examination In Public in 2011 the Council agreed to withdraw the document.

2. However, the current Site Allocations DPD and Tottenham Area Action Plan documents are similarly flawed. The Site Allocations and TAAP documents contain 'typos' - mistakes that give the impression of a project that is being rushed. They include no street names and hence most Haringey residents will be unable to ascertain what exactly they cover. The sites information is hopelessly sketchy and this makes it meaningless to comment on vague information. There are many spelling mistakes and maps that are wrong. The documents contain serious content mistakes such as some sites being in one document but not in the other. The failure to provide detailed, accurate and/or unbiased information prevents or restricts the ability of residents to comment on the proposals.

The information is sometimes biased and/or appears to be deliberately misleading in hiding the intentions. For example, the information about Broad Water Farm (SA63) portrays what the Council must have known are highly controversial proposals as being '*Potential improvements of the housing estate to improve stock, design of the site and routes through the area.*' This may sound innocuous. Yet local community reps' conversations with planning officers revealed the real agenda is to promote mass demolitions of homes, accompanied by house-building on the neighbouring park. Further, no information is provided on why the 3 Housing Association estates in the northern part of the 'zone' are included - but it transpires that the Council want to promote future Tall Buildings across these relatively recently-built low-level estates.

3. The process is not offering a genuine status quo on the identified SA sites, and across the board the presumption is to build something new on the sites rather than keep, improve and/or refurbish the current buildings and/or usage. This mirrors the notorious and unlawful Council Tax consultation, and contravenes the principles which led to the recent Supreme Court judgement against the Council.

4. The process is flawed because on some sites extensive work has been done by the Council or organisations working for it to draft and develop plans. For example, the pre-design brief workshop on Friday 20th March to discuss the initial brief for a building on Tottenham Leisure Centre car park. How can this be allowed when the site is out for consultation? It all suggests this is a done deal – at least in the minds of the Council. Similarly, the Council is progressing with the demolition of the Love Lane Estate and has issued the initial public notice. Yet, the council claims nothing is fixed and being included as a site doesn't mean there will be any development there.

5. In choosing to have only a six-week consultation the Council are not giving adequate time for local people to consider complex changes of deep and long-term significance in making decisions about planning and development in the borough. The voluminous 'supporting evidence' was not published sufficiently in advance of the documents and these proposals cannot be challenged without first understanding and analysing this evidence. As you must appreciate it is difficult to do this work with a longer and more comprehensive process, let alone in the very short time line you have set.

6. There has been conflicting information provided on when the consultation actually ends. Various official sources have the closing date as 23rd, 25th, and 27th March. In addition, the consultation is not valid because of the failure to individually

inform affected business and affected residents by letter. We request a list of all the addresses in Tottenham formally notified in this way.

7. There have been very little pro-active attempts to engage with residents. As far as we know there was only one special public meeting (as opposed to a few 'drop-in' sessions) - held at 163 Park Lane on Wednesday 11th March - for the entire Tottenham, and possibly for the whole borough. We are aware of the formal complaint made about this meeting and trust you will be taking that into account. But for the record the key points are set out here. The meeting was scheduled to start at 4pm. People attending the meeting were left waiting on the street until the officers arrived with the keys. The building was not opened until 4.18pm when the officers had just arrived. They then had to set up the room. In other words, a good part of the allocated time was wasted; it was ill-prepared and showed scant respect or regard for the residents and local community who had come to the meeting. Given that the issues are so serious and the implications for our neighbourhoods so immense, this was entirely unacceptable. Would developers be treated in the same manner? In addition, officers were not wearing their name badges, to differentiate them from people attending the meeting, and it is still not clear if there were full and proper minutes taken to record local views.

8. Other important opportunities to engage with local people were actually rejected by the Council. For example, the Tottenham and Seven Sisters Area Forum was cancelled despite other area forums being held. Again, entirely unacceptable, especially since Tottenham Hale ward is at the centre of many of your plans. Reasons given to residents for cancellation were risible and are again set out for the record. First, that the March 9 meeting was too close to the previous meeting; second that the date was close to the general election, and third that all the ward councillors were consulted and agreed it should be cancelled as they had several other meetings to attend. As residents we would ask, shouldn't having a dialogue with residents about the plans be a top priority for the Council since they will form the basis for the developments you wish to undertake? This was deeply disrespectful to residents as though their views and comments do not matter. The council has not organised any other meeting for residents as far as we know, and we would argue that this was and remains your responsibility given that these are your plans, your proposals about our neighbourhoods. You have the money, the officers and the resources to organise these meetings, yet they have not taken place.

9. The meeting now called for Tottenham Hale is for March 28th after the close of the formal consultation, and is described as an 'information day'. We do not accept this is adequate or indeed, constitutes consultation. A meeting for residents of Chestnuts Estate where major developments are proposed which could lead to loss of people's homes was called at the last minute and neither they nor the ward councillors were properly informed.

10. The Council has failed to promote residents' involvement as fully as required, even in its own communications channels. The e-alert Haringey People Extra on Friday 20th March did not mention that the consultation process was soon to close. Neither do the communications do more than present a positive upbeat picture of these changes to residents, rather than signposting to them the key issues which might concern them, such as loss of public housing, fewer socially rented homes, effects on green space, lack of local social infrastructure etc. That would be fairer and a more transparent approach. The Council is fully aware of Tottenham's demography but has not tailored its consultation to take account of this.

11. The consultation period also saw the publication of 15 large supporting documents. Given the task of understanding the four main documents, it has been impossible to both read and understand the supporting documents in the six weeks of the consultation. This restricts the ability of residents to make informed contributions to the consultation.

12. No accessible version of the documents has been provided and this is a serious failure to obtain the widest involvement of residents. In addition, the online documents were provided as pdfs and not in Word versions. This makes it very time-consuming for respondents to draft their responses to the documents. The council should be enabling involvement, not hindering the ability of residents to access the format of the documents.

13. According to p10 of the Tottenham AAP, para. 1.17: *'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 www.haringey.gov.uk/housing-and-planning/planning-policy/local-plan-2014-2016 but in summary the comments received highlighted a number of common themes'*. That link is invalid. Where is the report referred to? It does not seem to be here either: <http://www.haringey.gov.uk/housing-and-planning/planning-policy/local-plan-2014-2016>

[development-framework-ldf/tottenham-area-action-plans-aaps](#) The documents and links fail to evidence how Haringey Council's Tottenham AAP new draft and Sites Allocations take into account the comments received to the consultation in January 2014. However, absolutely no indication or evidence of how, whether and to what extent any of the comments, feedback and objections received by the Council during that previous consultation has altered the Council's preferred course. It is impossible to know whether any comments made by any resident or community group in Tottenham were taken on board. As far as the response submitted by the OT Planning Policy Working Group in March 2014 is concerned, most if not all comments, suggestions, objections and requests were ignored. This contrasts with the practice during consultations over previous iterations of the Local Plan (Unitary Development Plan and Local Development Framework) in acknowledging, responding to and publishing the details of each individual response to the draft Plan, adding what changes had been made (if any) as a result.

Consultation rescheduling

All of the flaws means the consultation is an unfair and unlawful attempt to force the Council's pre-determined agenda on residents. The odds are stacked against residents and local businesses being able to effectively engage and respond unless they can afford to hire lawyers or consultants to do so for them.

A. For the reasons above we request that this consultation be halted and replaced by a fresh consultation later in the year with improved documentation, adequate time to consider them, and a fresh programme of events organised by the Council to pro-actively engage people in the decision-making process. The period until the introduction of the fresh consultation should include briefing events on the numerous supporting documents.

B. In the alternative we call for an additional 6 weeks starting from 28th March in which the above activities can be organised.

We as a network are happy to help promote and be partners in effective and fair consultation processes.

We await your acknowledgement of the complaint and how the council will respond to the concerns and flaws in the consultation process.

Yours sincerely,

Dave Morris - for the Our Tottenham Planning Policy Working Group

3. OVERALL COMMENTS ABOUT THE ALTERATIONS TO STRATEGIC POLICIES 2011-2026

3.1 Overall scale of housing growth, location of this growth, and implications for existing and future social infrastructure

We understand that the Alterations to the Core Strategy have been prompted by the 2011 Census results and by the adoption of the Further Alterations to the London Plan (FALP) which were consulted upon in 2014 and 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>).

Secondly, it is clear that a significant part of this new increasing housing target is going to be directed to particular parts of the Borough: the Eastern part - and more specifically Tottenham. The Alterations to the Core Strategy increase the number of homes to be delivered within the wider Upper Lee Valley Opportunity Area, which includes a growth point at Tottenham Hale, from 9,000 homes to 20,100. In the Site Allocation DPD and Tottenham AAP it is stated that half of the strategic housing target (=10,000 homes) imposed on Haringey by the latest Alterations of the London Plan should be located in Tottenham. This is not realistic and potentially highly damaging to the existing residents and businesses. Several wards of Tottenham already have the highest densities in the Borough (see table and map below). Bruce Grove, Saint 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 and valuable housing estates – which means that the population density in the residential areas of those North Tottenham wards is high, too.

QS102EW - Population density in Haringey¹ (from 2011 census)

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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

QS102EW - Population density



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¹ <https://www.nomisweb.co.uk/census/2011/QS102EW/view/1946157250?cols=measures>

This foreseen housing target is far too high for the existing infrastructure of Tottenham and will place a strain on social infrastructure, in particular health facilities (already seriously deficient, as shown by the recent Healthwatch Report on the deficit of doctors in SE Tottenham) as well as on schools and road capacity. How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in the Site Allocation DPD and Tottenham AAP (see our separate responses on these two documents for more precise evidence on the deficit of social infrastructure in Tottenham, in relation to health, open space and schools).

This would also mean either unduly dense and very tall development, conflicting with the historic character of the area, with social sustainability and environmental objectives; or it would mean sacrificing valuable green space, needed employment land, and absolutely necessary social housing on existing estates.

3.2 The approach to affordable housing provision and to 'housing estate renewal' which permeates the Alterations to Strategic Policies (as well as Site Allocation DPD and Tottenham AAP)

We have made detailed comments in the original document of the Alterations to Strategic Policies with regard to the section and policies on housing. We strongly contest 3 aspects:

First, 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.

Second, we question the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). 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. 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.

An 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' is not 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.

Third, we strongly disagree with the approach embedded in the wording of Alt53 and Alt64 about Housing Estate Regeneration and Renewal. See detailed comments made in the original document of the Alterations to Strategic Policies. Also see the detailed response and comments we made in relation to housing estate renewal in the Tottenham AAP (in particular in relation to Northumberland park) and in the Site Allocation DPD, summarized in the box below.

We support Haringey Council's statement in the Haringey Local Plan & the Annual Monitoring Report for council's planning policies that 'provision and access to high quality and affordable housing' is a key priority for our borough [Haringey Local Plan 3.2 SP2 Housing p. 61 & Annual Monitoring Report p. 41]. This was further

emphasised by the Soundings Future recent consultation which highlights residents' responses in support of this key priority (see Appendix 2). This key priority can only start to be met by embedding the following principles CLEARLY in the policies on housing estate renewal in the Alterations of the Core Strategy (Alt53 and Alt64):

- 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 unit and no displacement of existing tenants as part of any plan for an estate.
- There should be no demolition of structurally sound homes.

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.**² Often

² 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.

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

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

old and new residents live parallel lives side by side with little 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’³, 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.⁴

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’⁵. 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:

CHESHIRE, 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/SERCP002.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.

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>

³ 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.

⁴ CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: *International Regional Science Review*, 32 (3): 343-375, 2009.

⁵ 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.

'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, 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'.⁶

3.3 The approach to employment growth and employment land

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, noted that the forecast employment growth for the borough is unrealistic (<https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf>).

We have made detailed comments in the original document *Alterations to Strategic Policies 2011-2016* with regard to the sections and policies which concern employment land. Here we want to challenge the evidence base upon which changes to these were made. The proposed changes are based on the ***Employment Land Study update*** which was released to the public in February 2015, leaving very little time to digest and challenge the evidence produced in it. We have identified a range of serious concerns about the Employment Land Study update which we believe need to be addressed before any Alterations to the Strategic Policies are made:

- The study displays a lack of understanding of the characteristics and strengths of the existing economy, in particular the activities underway within industrial land and high streets. Work from CASS Cities from Mark Brearley, Jane Clossick and their students is insightful here (see their separate submissions in this public consultation), as well as the survey of industrial estates (From Around Here) undertaken by Gort Scott architects and funded by Haringey Council and the GLA, here <http://www.gortscott.com/media/uploads/639-final-3.pdf>.
- A detailed survey of existing businesses (quantitative and qualitative) should be undertaken (see those undertaken by the LLDC in support of their local plan).
- Existing businesses, business groups and community groups have not been consulted or included within the stakeholder consultation conducted to inform this study. This makes it invalid and it should be repeated with a wider involvement of relevant local actors rather than just commercial developers and real estate actors, whose measure of success tends to be increases in rent rather than the broader concerns of Haringey Council and local communities. For example. The section on 'vacant floorspace' starting on page 34 implies that new workspaces are inherently more attractive

⁶ 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.

than existing ('second hand') premises. This is not the case and is indicative of the dominance of a developer/investor rather than business/tenant perspective within the employment land study.

- Maps should be included.
 - The study acknowledges that the market for offices in Haringey is weak (as it does not compete with the central London market) while the market for industrial space is generally strong, with particular demand for space for flexible premises for SMEs. Yet the study seems to project a replacement of the strong industrial market with the weak office market, by losing industrial floorspace to higher density office and mixed use developments. This seems very contrary to the evidence presented and potentially very damaging to Tottenham's economy.
 - The study acknowledges strong demand for industrial floorspace, and good occupancy rates on all estates, and yet still ends up recommending the relaxation of the status of some industrial areas to 'Regeneration Areas' to facilitate the delivery of the Council's housing and regeneration aims. The study is not considering how a failure to protect this workspace will impact on the Council's economic development aims. For instance, there is a lack of awareness about the role of existing workspaces in facilitating a growth in SMEs, green industries and social enterprises, despite these being stated aims of the Council's 2020 economic development and carbon reduction strategies. The study conveys no sense of the vision for the local economy.
 - The study acknowledges that new commercial floorspace development often results in a net loss of employment floorspace due to the removal of existing floorspace (para 8.10 and paras 5.136-5.138). This finding does not seem to be dealt with at all in the plans policies. The loss of well functioning and valued employment land to make way for contentious major developments that displace existing residents and businesses (e.g. High Road West, Spurs Stadium, Wards Corner) is a major concern and has not been considered at all within the various planning documents. Business displacement should be studied in detail as part of a new economic evidence base for the plan. It is particularly important to address this issue within the Tottenham AAPs.
 - There is no consideration of:
 - The impact of the relaxation of permitted development rights on the supply of employment space (the study explicitly says this has not been taken into account). As this change is likely to remove a lot of employment land from Haringey, not considering this makes the plan unsound.
 - The impact of the loss of industrial land across London making the employment land sites in Haringey and particularly Tottenham more attractive. The Tottenham Opportunity Investment Fund is based precisely on this understanding. The plan needs to take this into account also to be sound.
 - How different land uses relate to and rely upon each other. E.g. office / industrial / retail in and around high streets and town centres. There is no consideration of the links between retail and industrial land – the studies are entirely separate.
- Without prejudice to our broader concerns, we are also concerned that some of the recommendations of the updated Employment Land Study have not been carried through into policy. **New policies should be added to carry through the following recommendations:**
- Para 7.19 says that 'Any release of surplus employment land should not be to the detriment of successful B2 and B8 businesses... any B2/B8 businesses that are affected by the loss of

employment land should be relocated to suitable premises so that viable industrial and warehousing businesses are not adversely affected' (p.48). This is also explicitly specifically mentioned in relation to High Road West at para 5.57 yet no mention of this commitment is included in the Tottenham AAPs. A policy should be added to set this out, and to commit to properly compensating firms. However, due to pressure on industrial land, it will be hard to find suitable alternative sites within London.

- The employment land study recommends that guidance is provided on how B-class floorspace should be provided within mixed use schemes. This guidance does not exist elsewhere and should be provided. This is an untested approach and requires guidance.

4. GUIDING PRINCIPLES FOR DEVELOPMENT IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE REFLECTED IN THE ALTERATIONS TO STRATEGIC POLICIES WHERE RELEVANT

These principles were spelled out in Our Tottenham Response to the previous draft Site Allocation DPD produced in March 2014 (which including sites in Tottenham, now mostly in the Feb. 2015 Tottenham AAP consultation draft). They are based on the *Our Tottenham* Community Charter 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 Tottenham AAP and Site Allocation DPD. They should also be reflected in the Alterations to Strategic Policies where relevant (see our detailed comments in the Alterations document itself).**

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

4. DETAILED COMMENTS MADE IN THE ORIGINAL TEXT OF THE ALTERATIONS TO STRATEGIC POLICIES 2011-2026

See attached document, in which we made very detailed comments in relation to particular points and to specific sites, with the input of some of our affiliate members.

5. SUPPORTING EVIDENCE & APPENDICES

- **Appendix A1: Our Tottenham Community Charter**
- **Appendix A2: Our Tottenham Housing Factsheet: Demolition vs refurbishment**

OUR TOTTENHAM A COMMUNITY CHARTER

Planning & Regeneration by and for the Community

Adopted at the Our Tottenham conference, April 6th 2013. Amended at the conference, Oct 11th 2014



**OUR voices, OUR
communities, OUR
neighbourhoods**

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 Council are promoting their 'Plan for Tottenham', backed by property developers, big business, and the Mayor of London. The Council is gifting public money and assets to the profit-driven developers, and have so far largely refused to listen to the views of residents. The plans include a range of measures, some of which will seriously impact on our lives and our communities. The plans promote corporate-led and large scale urban development; increased rents and unaffordable housing; and the loss of some independent local shops, homes, community facilities and small businesses.

Coupled with the Government's planning policies and attacks on vital public services and people's welfare, the major effect of all this will be to over-develop Tottenham, to threaten its positive community-scale character in many areas, to promote profiteering at the community's expense, and the forced displacement of thousands of local people who can no longer find or keep any affordable place to live.

This is unacceptable. It doesn't have to be like this. Together we are very powerful.

We pay tribute to all those thousands of Tottenham residents and community groups who have campaigned and worked so hard to improve their local areas and facilities.

We pledge to fight for OUR common interests, OUR neighbourhoods, OUR community facilities and for the needs of OUR communities throughout Tottenham.

We call on the people of Tottenham to oppose all inappropriate planning and developments and campaign to defend facilities and proposals which are led by local residents, for our benefit, and which improve neighbourhoods for our communities - not just for the benefit of big business.

We will show support for and help initiate new resident and community-led development plans that support the interests of local people. We support the Our Tottenham community planning and regeneration action network set up to spread co-operation and solidarity throughout Tottenham's neighbourhoods.

Together with local people we will take action to....

- Defend community facilities * Stand up for decent and affordable housing for all
- Support the local economy * Promote quality design and respect for heritage
- Improve the street environment * Support youth voices, services and facilities
- Defend and expand good public services * Work towards environmental sustainability
- Empower our communities * Develop local community plans

OUR TOTTENHAM – A COMMUNITY CHARTER: Objectives

Together with local people we will take action to....

DEFEND COMMUNITY FACILITIES: protect and expand the 'social infrastructure' our communities value and rely on, including community centres, local pubs, corner shops, playgrounds & parks, GP surgeries, post offices etc

STAND UP FOR DECENT AND AFFORDABLE HOUSING FOR ALL: ensure that new developments provide the secure, affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out of our borough

SUPPORT THE LOCAL ECONOMY: Starting with the strengths and needs of Tottenham's residents, small businesses, social enterprises, cooperatives and community assets, putting sustainability, equality, local needs and community service at the heart of the local economy

PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: protect Tottenham's listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality

IMPROVE THE STREET ENVIRONMENT: ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery

SUPPORT YOUTH VOICES, SERVICES AND FACILITIES: encourage and support our local youth speaking out for the services, centres and facilities they need

DEFEND AND EXPAND THE PROVISION OF GOOD, FREELY-ACCESSIBLE TO ALL, PUBLIC SERVICES They should be responsive to the everyday needs of our communities eg Health, Education, Welfare, Social Services and Social Care, Public Transport etc

WORK TOWARDS LONG-TERM ENVIRONMENTAL SUSTAINABILITY: promote and encourage low/zero carbon energy, reduced consumption and waste, sustainable travel, biodiversity and natural habitats, and local production of food and other necessary goods and services. Our lives, our communities and our society should be sustainable for generations to come.

EMPOWER OUR COMMUNITIES: ensure real respect, engagement and empowerment for our communities and community groups so that they are driving the decision-making

DEVELOP LOCAL COMMUNITY PLANS: develop our own ideas and visions for our local sites & neighbourhoods

The Our Tottenham Charter was drafted by a series of open meetings of Tottenham community groups from January to April 2013. The Charter's Action Points were developed, discussed, amended and adopted, along with the Charter as a whole, by the Our Tottenham open conference on 6th April 2013, attended by 110 people from over 30 local community organisations. They were collectively formulated by those attending workshops at the conference, and those that have been adopted are the ones ratified by the conference as a whole (through an overwhelming show of hands in support). There were further clauses discussed and agreed at the Oct 11th 2014 conference. It is intended that the Charter - especially its Action Points - is able to be further reviewed and developed in the future, as needed. This may be done at a recall conference or via some other appropriate inclusive process.

The Our Tottenham network includes: 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, Eriba Arts, 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, Lordship Rec Eco-Hub Co-op, 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 Cttee, Tottenham Constitutional Club, 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

OUR TOTTENHAM – A COMMUNITY CHARTER

Action Points

(As agreed April 2013, and amended Oct 2014)

Together with local people we will take action to....

DEFEND COMMUNITY FACILITIES: protect and expand the 'social infrastructure' our communities value and rely on, including community centres, local pubs, corner shops, playgrounds & parks, GP surgeries, post offices etc

- Encourage and produce case studies from users to protect existing facilities, conduct needs assessments for what local people need, and compile a dossier to present to the relevant authorities
- Hold the Council accountable for funding choices and patterns around the borough and in comparison with other boroughs so that Tottenham gets the best facilities to serve our communities
- Support threatened community-run community centres in any lobbies or protests they organise
- Encourage community groups and centres to share resources and experiences

STAND UP FOR DECENT AND AFFORDABLE HOUSING FOR ALL: ensure that new developments provide the secure, affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out of our borough

- Support residents associations and residents action groups that raise, or can raise these issues
- Challenge Council policies on housing in new developments. Set our own agenda for, and definition of, genuine 'affordability' and 'security of tenure', in contrast to Council definitions.
- Raise public awareness regarding the need for genuinely affordable housing, long-term security of tenure and people's housing needs generally, and the need to speak up for this.
- Support the residents of Love Lane Estate, and any other residents, threatened with possible relocation and demolition

SUPPORT THE LOCAL ECONOMY: Starting with the strengths and needs of Tottenham's residents, small businesses, social enterprises, cooperatives and community assets, putting sustainability, equality, local needs and community service at the heart of the local economy

- Support local businesses at risk of displacement through development schemes.
- Support good pay, conditions and rights for local workers.
- Campaign for sustainable, quality jobs and training for local people through any new development, with training delivered by local organisations
- Develop our knowledge of the local economy and build relationships between residents and traders.
- Promote and celebrate the strengths and assets of the existing Tottenham economy

PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: protect Tottenham's listed buildings, conservation areas and general positive architectural characteristics, and ensure any new development is of good quality

- Safeguard and value heritage buildings, including those outside Conservation Areas
- Campaign for at least 50% of all new homes to be genuinely affordable social rented housing
- Ensure that heritage-led regeneration benefits Tottenham residents in the short, medium and long term, and doesn't lead to the kind of gentrification which forces people out of Tottenham
- Identify and improve quality of design, amenity and sustainability standards for all new development

IMPROVE THE STREET ENVIRONMENT: ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery

- Council to ensure that Tottenham's air quality is as good as in the West of Haringey
- Maximise the spread of 20mph zones, car-sharing schemes, on-street cycle lock-ups, and pedestrian and cycling connections/networks across the borough
- Encourage Residents Associations (RAs) & the Haringey Federation of RAs to set up a street scene sub-group/network
- Publicise and promote options for street improvements, including Streets In Bloom, DIY Streets, Home Zones, Play Streets, improvements to front gardens, more benches and community-run notice-boards
- Campaign for High Streets to be re-designed more for people and less for cars

SUPPORT YOUTH VOICES, SERVICES AND FACILITIES: encourage and support our local youth speaking out for the services, centres and facilities they need

- Support young people to take make the key decisions about their needs, to demand the best possible opportunities and funding due to them (equal to the best practice elsewhere), and to take charge of their future
- Support organisations who work with young people - in a way they are happy with - to deliver future services, and publicise successful youth activities and projects as an example to emulate
- Support ex-youth workers to get together to form their own network and to conduct local outreach
- Re-establish and open additional dedicated venues for young people to meet and socialise, that are adequately supported and resourced.
- Ensure young people can access the information and skills they need

DEFEND AND EXPAND THE PROVISION OF GOOD, FREELY-ACCESSIBLE TO ALL, PUBLIC SERVICES They should be responsive to the everyday needs of our communities eg Health, Education, Welfare, Social Services and Social Care, Public Transport etc

- free healthcare to be preserved and extended, and accessible to all
- improved and expanded healthcare to be an integral part of any new Plans

WORK TOWARDS LONG-TERM ENVIRONMENTAL SUSTAINABILITY: promote and encourage low/zero carbon energy, reduced consumption and waste, sustainable travel, biodiversity and natural habitats, and local production of food and other necessary goods and services. Our lives, our communities and our society should be sustainable for generations to come.

We will promote and encourage:

- sustainable energy policies in all areas of society - eg reduced general usage, and maximum use of renewable, non-fossil fuels and self-generated sources
- reduced consumption & waste, and maximum re-usage & recycling
- sustainable travel - including more walking & cycling, better public transport & less motorised traffic
- local production of food and other necessary goods and services, and appropriate allocation and sharing of limited resources
- protection and improvements to green spaces and natural habitats

EMPOWER OUR COMMUNITIES: ensure real respect, engagement and empowerment for our communities and community groups so that they are driving the decision-making

- Defend and create new spaces and hubs where people can meet and organise themselves, share skills and expertise. – and form a working group to achieve this *
- Develop our own outreach to involve and link in with wider groups and all sections of our communities
- Encourage and promote a range of communications among local people, including face-to-face, blogs and a newspaper.

DEVELOP LOCAL COMMUNITY PLANS: develop our own ideas and visions for our local sites & neighbourhoods

- Promote community planning and community plans of all scales and at all levels – for sites, streets/estates, neighbourhood and Tottenham-wide - and form a working group to achieve this. **
- Organise workshops to empower people to develop community plans, especially ones that are enforceable.
- List and publicise all the positive examples of community plans

COMMUNITY PLANNING POLICIES

AS AGREED AT CONFERENCE, Feb 1st 2014

Key guidance and action points

Develop community visions and turn them into Plans

- Map out existing community assets to help in the development of community planning
- Create physical and virtual space to collect together information about everything that local community / campaign groups are doing in Tottenham, in order to make such information widely accessible
- Present plans in a financially and socially viable way

Access and press for the funding/resources needed to implement Plans

- Our Tottenham members are encouraged to map, register and where possible run community assets
- We should consider forming appropriate planning and development bodies (eg Neighbourhood Forums & Trusts)
- To research and consider the range of potential resources and how to access them

Relations with Council and other official and commercial bodies to achieve Plans

- Keep building up the Our Tottenham network to increase legitimacy, co-operation and cohesion, so that groups in Tottenham are strong and working together
- Develop our research and evidence base, sharing knowledge, experience and information about the area and what is important to us in Tottenham
- Be prepared to negotiate in various ways and times with the authorities generally and around specific schemes - and be aware of how the authorities work so that we can participate in official discussions and planning

Understand, use and negotiate legal/planning processes

- As individuals, groups and where possible as a network we should formally respond to relevant council consultations, especially the Tottenham Area Action Plans and the Sites Allocations.
- We need to insist that consultation processes are accessible, transparent and genuine
- We must publicly hold councillors to account for their policy decisions
- We need to have multiple lines of engagement over planning issues, and must continue to develop our own community vision and policies, alongside our critique of existing official proposals, plans and policies.

Mobilise public support and exercise our power to achieve Plans

- When developing Plans we need to engage young people and all sections of our local communities
- Find a common simple message to unite and rally people around
- Be well organised through developing action plans, and local community and solidarity networks.

The agreed next steps

1. We pledge to support Community Planning throughout Tottenham. We will encourage local people to develop their own plans for the improvements to local sites, facilities and neighbourhoods, and for Tottenham as a whole.
2. We insist that all those with wealth, resources or decision-making power affecting any or all of our neighbourhoods work in genuine partnership with those who live or work here, support our community organisations, and help implement local community plans and community-led regeneration.
3. We will continue to encourage and support local people to challenge any and all inappropriate or inadequate development proposals which do not address the real needs of our communities, or which displace local people. Our Tottenham pledges to continue to support all groups that are developing their own plans or defending community assets that are under threat. Our Tottenham will respond to official Council consultations regarding Tottenham.
4. We will set up a Community Planning Working Group promoting and supporting community planning, local planning workshops and residents' own consultations. The group will also co-ordinate the efforts to develop a Community Plan for Tottenham. The Community Planning group will be guided by the Community Charter, and by the agreed action points coming out of the conference workshops.
5. We will support the development of other Our Tottenham Working Groups, eg on the Local Economy, Housing, Planning Policy, Community Facilities, Youth, Community Planning, Communications etc,...
6. We agree there should be an Our Tottenham Recall Conference in summer/autumn 2014 to strengthen the work and increase the size of the network and its Working Groups, evaluate the Community Charter, and to discuss how best to mobilise our communities to speak out for their interests.

A Community Plan for Tottenham: 'Road Map' [Agreed at Conference 11.10.2014]

We have agreed as a network to create a Community Plan for Tottenham as a whole.

This is so that the real collective needs and desires of the people who live or work in Tottenham can be put centre stage in the debate and battles over the decision-making over the future of our own communities and neighbourhoods. Below we set out a process for achieving much of this over the next 12 months.

A good foundation has already been made!

What we want to achieve is guided by our Community Charter, the experiences of successful local community planning efforts and community visions for various sites, various genuine consultations already done, and the preliminary work of the Our Tottenham Community Planning Working Group.

Some of the key questions we will have to address are:

- How do we create an **over-arching Plan**, whilst including the **existing community visions and Plans for various sites**, and maybe developing **several mini-Plans for different geographical areas** on the map (eg N/S/E/W/Central Tottenham?).
- How do we integrate the **various key 'sectors'** e.g. community buildings; shops and workplaces; green spaces; housing; public facilities, etc?
- How can **everyone contribute to the process**, including involvement and support from community groups and the wider public? How do we make sure this is an inclusive process? Workshops, Questionnaires etc?
- At the same time how can we **forestall adverse moves by Council/developers** in time to prevent things we don't want from becoming irreversible?

What we've already achieved so far - as a foundation for the next steps:

- 1. Produced a summary of a wide range of successful & inspiring community-led Tottenham projects**
- 2. Adopted a Community Charter** (April 2013) with positive policies on what we want
- 3. 46 community organisations have so far signed up to the Charter.**
- 4. Held a Conference on Community Planning** (Feb 2014), which adopted a series of further recommendations for moving forward
- 5. Agreed a set of Guiding Principles** for the evaluation of proposed urban development plans/sites etc
- 6. Set up a Community Planning Working Group**
- 7. Started compiling a range of Reports and Consultation documents already produced** (eg Tottenham Futures, Atkins Open Space Assessment etc) which contain quite a lot of detail about what people want and deficiencies that need addressing etc
- 8. Started Information Mapping (online and on paper)** collating a large amount of data about Tottenham, its facilities, services, buildings, open spaces, population, community groups etc
- 9. Started developing Working Groups on a number of key themes** (Economy, Housing, Planning Policies etc) which will help focus and guide activity

Some next steps up to the spring 2015:

- 10. Have a more detailed look at successful Community Plans in Tottenham and elsewhere**, eg the process, visioning, community involvement, funding etc. How did they do it? What could we learn from them?
- 11. Identify special qualities, strengths and uniqueness of Tottenham**, and our local communities / neighbourhoods / facilities / services / peoples etc
- 12. Make some comparisons between Tottenham and other parts of London** to show how we are integrated into the wider city
- 13. Start to involve more of Tottenham's community groups and our wider communities** in this process, including specialist groups which can advise the network regarding key themes.

- 14. Update and launch the Information Mapping about Tottenham**, including an audit of black and minority ethnic Centres and spaces. Find a technical coordinator.
- 15. Clarify the planning policy basis for a Community Plan** ie Local, London and National official policies supporting Community Planning
- 16. Do fundraising** to support development of an initial draft Plan
- 17. Assemble a team of volunteers** to kick off the creation of the draft Plan – outreach / community workshops / volunteers (eg network members, Team London etc), with a strategy for involving students.

Steps up to the Summer 2015

- 18. Create a Visioning Document** (Skeleton) to be adopted at the next OT conference

- **Appendix A2: Our Tottenham Housing Factsheet: Demolition vs refurbishment**

OUR TOTTENHAM – HOUSING FACTSHEET

Housing: Demolition vs refurbishment

There is compelling evidence that estate or tower block refurbishment, in all but the most extreme cases, is both cheaper and less damaging to the local environment than demolition and new build. (Anne Power, 2008, “Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability?”). Anne Power identifies a list of issues and assumptions that are not addressed in arguments in favour of demolition.

- **Demolition breaks up the essential social infrastructure and social capital** in neighbourhoods, which take decades to build up again. Facilities and meeting places are costly to reinstate once they have been lost, and young people can become very disorientated as demolition is planned and carried out. Government research about social capital identifies a strong relationship between local social networks and individual well-being and resilience. There is a need for research that looks at the social and financial costs of breaking up local social networks, in particular the impact on young families, children and the elderly.
- **Demolition plans have knock-on effects** on schools, shops, health provision, banks and other local services, most of which leave an area before it is demolished and do not return till long after rebuilding, if at all. This causes hardship to the residents and, if they are elderly, can have very negative health impacts
- **Rebuilding timescales are slowed by the need to renew infrastructure** after demolition. The whole process can take up to 20 years. All in all, it is rare for a demolition plan to deliver replacement housing in less than 10 years, even with strong government backing and funding, as the Housing Market Renewal area demolitions are showing. It often takes far longer.
- **Embodied carbon** [the original construction materials] in homes that are being destroyed and in replacement homes is not ‘counted’ in proposals in favour of demolition.
- **Demolition and renovation waste** make up about one-third of all landfill.

- **The infrastructure required for new building** and its significant energy costs and emissions impact are not discussed.

All these factors make demolition costly, disruptive, damaging to wider areas and therefore unpopular. The local environmental impacts of demolition are obvious: unsightly boarding up, accumulated rubbish, increased dumping, overgrown gardens, decayed streets and reduced maintenance. The wider environmental impacts of demolition are even more serious: loss of valuable and increasingly scarce materials; impact on landfill sites; transport of materials to and from demolition sites; particulate pollution in the process of demolition and transportation of rubble; and loss of housing, creating the need for new housing with its high embodied energy. Only the most extreme physical conditions justify such high social, economic and environmental costs.

Here are 3 specific examples with the costs of the refurbishment provided:

Edward Wood Estate, Hammersmith and Fulham.

The refurbishment works included adding wind turbines, cladding and solar panels to three tower blocks. In addition, there was refurbishment of the communal areas, construction of 12 penthouses for sale (on top of the tower blocks), new lighting and refurbishment of main electrical systems, double glazing to windows in stairwells, installation of gas central heating to bedsits and conversion of ground floor spaces to provide seven offices for voluntary organisations. The total cost was 16.3 million. However, the funding for the works came from a variety of sources – including sale of the penthouses, money from the Greater London Authority and section 106 planning gain monies. The total cost to the Housing Revenue Account (which leaseholders would have been required to contribute to) was £3.5m. Each block had 176 homes, so the total cost to each leaseholder would seem to be £6,666. There is an expected 72% reduction in fuel bills for residents as a result of the environmental improvements.

Colne and Mersea Houses, Barking and Dagenham.

These are two 17 storey 1960's blocks with 204 flats. The works carried out comprised installation of photovoltaic roof panels generating 55kWp of electricity, triple glazed windows; some with integrated blinds, external cladding, insulated roofs, flood mitigation works, life replacements, improved door entry systems and CCTV, upgraded common areas, single IRS satellite TV system, new heating and heat distribution system, Smart meters for each home, kitchen and bathroom upgrades and low water appliances.

The low carbon work carried out plus decent homes work cost a total of £10.6 million. £3.6 million came from the GLA. The cost proportionate cost to each leaseholder would have been around £34,000. There is an estimated reduction in residents' fuel bills of £400 per year.

Ethelred Estate, Lambeth

Three tower blocks were part of a 'sustainable refurbishment' project – to achieve an 80% reduction in carbon emissions. The blocks were built in the 1970's – comprising 297 flats. The works included new kitchens and bathrooms, thermal installation, window renewal, roof renewal, communal heating improvements, a photovoltaic façade / solar panels, redecoration of communal areas, lift replacement and landscaping works. The total cost was £15.7 million, with £9m coming from the LDA and Concerto Project. The cost to leaseholders would have been around £22,500

The costs of these projects vary and are also dependent on how much additional money can draw in to reduce the cost to the Housing Revenue Account and thus the proportionate cost to leaseholders. Newham would have the potential to use section 106 monies – including from the Olympic Park and also monies raised from the use of the Carpenters Estate tower blocks for advertising.

THE ABOVE IS AN EXTRACT FROM THE CARPENTERS ESTATE COMMUNITY PLAN

The social cleansing of housing estates in London

By Loretta Lees - Just Space, The London Tenants' Federation and Southwark Notes Archives Group

We are clear that the regeneration of council estates in London is nothing more than a state-led gentrification strategy disguised by a liberal policy rhetoric of mixed communities.

Together as academics and activists [1] we have researched four London council estates, all at different stages of renewal: the Heygate Estate (finally empty as the last of the leaseholders, who were asserting their right to proper compensation through a public inquiry around their CPOs, was forcibly evicted by high court bailiffs at the instruction of Southwark Council'), [2] the Aylesbury Estate (part of which has been redeveloped, the rest of which is being decanted or is still in limbo), the Pepys Estate (where a council tower block, Aragon Tower, was redeveloped by Berkeley Homes into the Z Apartments), [3] and the Carpenters Estate (whose residents vigorously and effectively opposed the London Borough of Newham and UCLs plans for a UCL-led development, and whom we have been helping to develop an alternative neighbourhood plan). [4]

Mixed Communities Policy was launched by the previous New Labour government to tackle social exclusion in deprived areas such as council estates. New Labour believed that they could reduce social exclusion and promote social mobility for the poor by mixing them with the middle classes the idea being that the social and economic capital of the middle classes would trickle down to the poor through social mixing. The goal of this revanchist form of social engineering was a new moral order of respectable and well-behaved (middle class) residents. Despite a change of government and no new national discussion on mixed communities policy, local councils in London still cling to it as the selling point for their regeneration schemes (as seen in the current Earls Court regeneration plan).

But there is significant evidence of the poor performance of ‘mixed communities’ policy with respect to its claims to aid the social and economic mobility of the poor. Geographers have called it a faith-based displacement activity. The evidence to date [5] indicates that mixed communities policy improves the life circumstances of neither those poorer residents who are able to remain in the neighbourhood, nor of those who are moved out. Indeed, there seems to be quite persuasive evidence [6] that specialised neighbourhoods have labour market advantages, even for the poor; indeed particularly for the less skilled who rely on personal contacts to a greater extent to find jobs.

The term the new urban renewal has been used [7] to describe the American HOPE VI programme of poverty deconcentration, in which public housing projects in US inner cities have been demolished (much as London council estates are being demolished in the name of mixed communities policy) to make way for mixed income housing in ways very similar to post-war urban renewal programmes in the US. Despite a new emphasis in 21st century London on partnership working, community involvement, and sustainability, the results are the same: the destruction of local communities and the large-scale displacement of low-income communities (see the SNAG maps showing the displacement of council tenants and leaseholders from the Heygate Estate).

The process for all four regeneration schemes we have looked at has been very similar:

First, local authorities made out that the estates were failing in some way, socially or economically; they were sink estates, they were structurally unsound, etc. These were often misrepresentations and falsehoods.

Second, the local authorities systematically closed down options and subsequently created a false choice for the estates residents between living on estates that needed upgrading and repair (which they were very unlikely to get) or newly built neighbourhoods in which they were

unlikely to be able to afford the rents let alone get a mortgage, and even if they did they would not be living with their existing community.

Third, residents support for these regeneration programmes was more often than not misrepresented or misused.

Fourth, the delays and uneven information flows meant that residents often struggled to fight - many lived and still live in limbo, unsure about the future of their estate, many suffered and continue to suffer from depression and exhaustion.

Fifth, the affordable housing supposedly being made available to the ex-council tenants is a con - much of the housing deemed affordable by the government is out of the reach of households earning below the median level of income in London (around £30,000 p.a. in 2012)! [8]

The fact is that a variety of unjust practices have been, and are being, enacted on these council estates.

In this project we have been gathering the data (evidence of resident and business displacement and unjust practices) and the tools (examples of alternatives) necessary to try to halt further demolitions and social cleansings, and to develop community-led alternatives for sustaining existing communities on council estates in London. We are in the process of producing an anti-gentrification toolkit that will provide tenants, leaseholders and housing activists across London with the information that they need to recognise council estate destruction as a form of gentrification, and also with suggestions for practical ways to fight it.

If we truly want London to be a socially mixed city we must stop the social cleansing of its council estates now! It is already getting too late!

References

- 1 This research is funded by a 2012 Antipode Activist Scholar Award, PI: Loretta Lees, CoIs: London Tenants Federation, Richard Lee/Just Space and Mara Ferreri/SNAG, Challenging the New Urban
Renewal: gathering the tools necessary to halt the social cleansing of council estates and developing community-led alternatives for sustaining existing communities.
- 2 35 Percent: Campaigning for a More Affordable Elephant. Heygate Leaseholders Forced to Leave Their Homes, <http://35percent.org/blog/2013/07/20/heygate-leaseholders-forced-to-sell-their-homes-cpo-approved>
- 3 See Davidson and Lees (2010)
- 4 CARP and the UCL students campaign did influence UCLs decision to back out, but there were also economic factors regarding the price of the land, etc, and more generally the failure to reach a commercial agreement (read the interview with the former UCL Provost Malcolm Grant in <http://cheesegratermagazine.org/investigations/2013/5/13/interview-with-the-provost.html>).
- 5 See Bridge, Butler and Lees (2012); and specifically on London, Arbaci and Rae (2013).
- 6 See Cheshire (2009).
- 7 See Hyra (2008).
- 8 See <http://www.londontenants.org/publications/other/theaffordablehousingconf.pdf>