

**Consultation on the *Tottenham Area Action Plans*  
Regulation 18 Consultation Document**

**RESPONSE BY THE *OUR TOTTENHAM* NETWORK  
PLANNING POLICY WORKING GROUP  
5<sup>th</sup> March 2014**

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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 40 key local community groups, projects and campaigns standing up for the interests of people in Tottenham, especially around planning and regeneration issues ([http://ourtottenham.org.uk/?page\\_id=31](http://ourtottenham.org.uk/?page_id=31)). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham. 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*** on 6 April 2013 (available here: <http://ourtottenham.wordpress.com/community-charter/>). This was followed up by a Community Planning for Tottenham conference in February 2014. See in the Appendices the Reports of our two conferences in April 2013 and February 2014.

The ***Our Tottenham network*** currently includes: Bull Lane Playing Fields Campaign / Weir Hall Action Group, Chestnuts Community Centre, Clyde Area Residents Association, Day-Mer, Defend Haringey Health Services, Find Your Voice, 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 Left Unity, Haringey Living Streets, Haringey Needs St Ann's Hospital, Haringey Private Tenants Action Group, Haringey Solidarity Group, Haringey Trades Union Council, Living Under One Sun, Lord Morrison Hall / Afro International, N.London Community House, Peoples World Carnival Band, Selby Centre, The Banc, Tottenham and Wood Green Friends of the Earth, Tottenham Chances, Tottenham Civic Society, Tottenham Community Choir, Tottenham Community Sports Centre, Tottenham Concerned Residents Committee, Tottenham Rights, Tower Gardens Residents Group, Tynemouth Area Residents Association, University and College Union at CONEL, Urban Tattoo, Wards Corner Community Coalition, 1000 Mothers' March Organising Group, 20's Plenty for Haringey.

The stated aim of the ***Tottenham Area Action Plans*** (AAPs) is to facilitate and deliver the regeneration of Tottenham. The web page of the AAP consultation states that '*we are committed to transforming Tottenham into a successful place where people want to live, work and visit.*' Most local residents and businesses are happy and proud to live, work and invite their friends to

Tottenham. It is already 'a place for diverse communities that people are proud to belong to', to use the headline of the Sustainable Community Strategy 2007-2016 approved by the Council. Consequently, the aim of attracting new investments, new residents, new businesses and new development to Tottenham which underpins the AAPs should not be done at the expense of the existing community, i.e. by displacing local residents and local businesses; and it should actually improve the lives of existing residents (by creating jobs which locals can access and developments which generate true and significant benefits or facilities accessible to the community). Regeneration should not lead to gentrification in which local residents are forced or priced out of the area, and should not be done at the expense of the people of Tottenham. We do not want a form of regeneration which will over-develop Tottenham, which will push up house prices and private rents, reduce the amount of council housing in the area, force out small shops and businesses, encourage the exploitation of low-paid workers, and drive out large numbers of the poor and members of ethnic minorities to make way for a new higher-income population.

## **2. Overall response to the *Tottenham Area Action Plans Regulation 18 Consultation Document***

The *Tottenham Area Action Plans Regulation 18 Consultation Document* and the associated *Site Allocation DPD* do not 'reflect the community's aspirations for the area'. A consensus will only be built if the proposals put forward for the Tottenham area, and for the key sites earmarked within it, meet the unmet needs and demands of the existing residents and businesses of Tottenham. The 'compelling case for comprehensive change' (p. 11 of the *AAP Reg. 18 Consultation Document*) and the strategic priority given to new, large-scale development in Tottenham in the London Plan and in various statutory and non-statutory documents of Haringey Council (e.g. the *Plan for Tottenham*) cannot be realized at the expense of the people already living and working there.

We therefore disagree with the basic premises of the 'scale of change' referred to on page 4 of the *AAP Reg. 18 Consultation Document*. The target of 10,000 new homes in Tottenham is totally over-estimated. 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 – which means that the population density in the residential areas of those North Tottenham wards is high, too.

Tottenham suffers from a chronic shortage of key facilities such as GPs, open space, schools etc... Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. The sentence of the last bullet point on page 5 of the AAP Reg. 18 consultation document is incomplete, but seems to refer to the need for more and better social infrastructure - we strongly agree that there is an acute need to improve the quality and amount of existing social infrastructure. Consequently, how an additional 10,000 new homes would be accompanied by the necessary additional amenities and services would need to be convincingly demonstrated, which is not the case at present. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly in the *Tottenham Area Action Plans Regulation 18 Consultation Document* and the associated *Site Allocation DPD*.

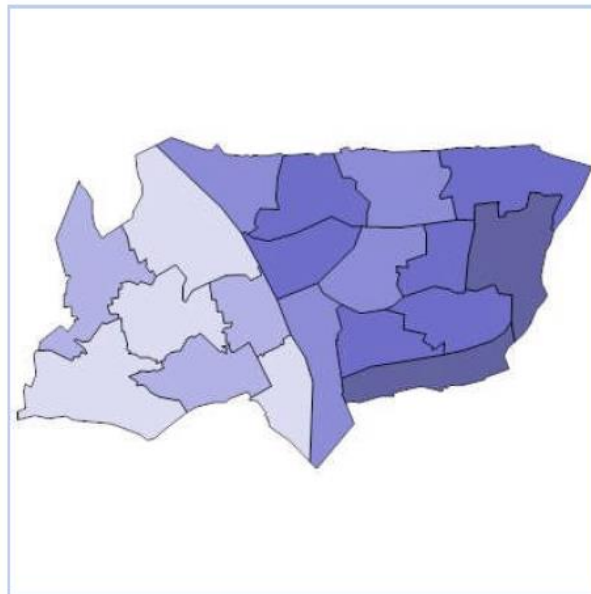
QS102EW - Population density in Haringey<sup>1</sup> (from 2011 census)

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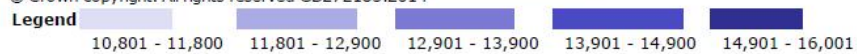
The wards highlighted in yellow are located in Tottenham.

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

In a densely-populated borough with competing priorities for the use of existing land, and a scarcity of any further available land to use, it is clearly essential to challenge detailed policies which promote over-development, and fail to protect and extend open spaces and other community facilities. Such policies are not socially or environmentally sustainable. This has been officially recognised by the Council, as far back as its formal response (19.10.2005) to the Mayor of London over his draft North London Sub-Regional Development Framework - the most significant planning document affecting the borough at that time following the adoption of the London Plan:

*'... the Council ..... is concerned that the document lacks visible plans and proposals for essential infrastructure, such as transport, which is necessary to enable London to operate as a world class city.'*

*'It is considered that the document has missed the opportunity to promote greater sustainability by not addressing wider sustainable communities issues, such as homes for life, transport, social care services, access to community facilities for older people and equalities, including age discrimination. These are key quality of life issues for people living in London.'*

*'The Council is concerned that the phrase 'intensification should be sought across the sub-region' (paragraph 105) does not address the character of areas. .... Some areas of Haringey are suburban in character with relatively lower densities and it should be recognised that these areas provide a role in providing family sized housing. It would be helpful if the SRDF provided some analysis of future housing density in North London and provided maps of public transport accessibility and urban character.'*

*'The Council considers that the London Plan has prioritised housing provision without sufficient attention given to the need for necessary community, health and education infrastructure. For example, Haringey will experience particularly high growth in school numbers up to 2021, which will place considerable pressures on its existing schools. The Council is concerned that there may not be sufficient land to cater for a necessary increase in the number of health care services in the borough and such services will have to compete with other land uses, such as housing and employment uses.'*

*'The Council disputes the assertion in the draft SRDF that the anticipated increase in demand for health care will largely be absorbed by existing services (paragraph 65). Where is the evidence to support this claim? Also, the conclusion that primary care provision is inadequate to meet future demands contradicts this claim. It would be helpful if the SRDF identified the relationship between the development of Opportunity Areas or Areas for Intensification and other areas of significant housing growth and the location of planned or improved primary care facilities and location of school development.'*

*'The Council considers that significant additional public transport infrastructure and services are required to support housing growth and regeneration initiatives and to improve access to jobs for Haringey's residents. Although it is recognised in paragraph 121 that stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas, there is an absence of schemes in the draft SRDF to improve orbital movement or to improve key transport interchanges.'*

These comments re-emphasise the Council's comments made as part of the formal consultation over the London Plan itself. The LBH Executive Committee meeting on 17<sup>th</sup> September 2002 accepted the proposed response to the London Plan drafted by the LBH Director of Environmental Services. The Report stated [Para 3.7 of the Report to the Executive] that '*... it may be considered that it [the Draft London Plan] involves an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough*'. The Report also noted [Para 6.28] that '*the approach..... would impact upon Haringey residents' quality of life' .... 'and fails to provide a sustainable solution to housing demand in London'. 'The proposed housing target... would require more schools to be built, class sizes increased, pressure on community facilities and supporting services*'. It notes '*lack of land and funding for supporting services e.g. schools*', and '*lack of engagement with local communities on bringing forward such a controversial proposal for high density housing development in advance of transport infrastructure.*'

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

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

In London the average is 1639 patients per GP, according to a Kings Fund report on '*General Practice in London*'<sup>2</sup>. However, by going through the information for each practice provided for patients on <https://www.myhealth.london.nhs.uk/>, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below<sup>3</sup>. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average, than London GPs in general.

Patients per doctor in Tottenham					
Name of surgery	Map ref *	Map ref*	No. of patients registered	No. of GPs** in the practice	Patients per GP
Spur Road Surgery		2	970	1	970
Dr AUK Raja		12	1019	1	1019
Dr RS Caplan & Partners		22	6660	5	1332
Dr K Sivasinmyanathan & Partner		1	2913	2	1457
Dr R Singh & Partner		25	3028	2	1514
Tynemouth Road Health Centre		19	9116	6	1519
THE BRIDGE HOUSE SURGERY		24	9903	6	1651
West Green Surgery		4	7525	4,5	1672
Dr DK Kundu		20	1698	1	1698
Lawrence House Surgery		3	10507	6	1751
Dr DK Suri	2		1887	1	1887
JS Medical Practice		5	3860	2	1930

<sup>2</sup> [http://www.kingsfund.org.uk/sites/files/kf/field/field\\_publication\\_file/general-practice-in-london-dec12.pdf](http://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/general-practice-in-london-dec12.pdf)

<sup>3</sup> Data on the GPs was collected from <http://www.nhs.uk/Service-Search/GP/LocationSearch/4> and <https://www.myhealth.london.nhs.uk/>, taking in all practices which are within one mile of St Ann's Hospital and/or 639 High Road, N17 and which are also located within Haringey boundaries.

Dr AP Ansari		10	1978	1	1978
Charlton House Medical Centre		23	6140	3	2047
Dr ATM Hoque		11	4334	2	2167
Park Lane Medical Centre	6		2345	1	2345
Somerset Gardens Family Health Care Centr	7		11929	5	2386
The Old Surgery 572 Green Lanes		13	2469	1	2469
Grove Road Surgery		8	2661	1	2661
Havergal Surgery		14	5444	2	2722
Dowsett Road Surgery	5		3037	1	3037
Bruce Grove PHCC		16	8979	4	2245
Westbury Medical Centre		18	8169	6	1362
The Morris House Group Practice		15	11722	2	5861
Broadwater Farm Health Centre		9	3549	1	3549
Dr KR Jeyarajah & Partner	3		4345	1	4345
CASTLEVIEW SURGERY	4	21	8979	4	2245
Total			145166	72,5	2002

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

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

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

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

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

Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's *Guide to Preparing Open Space Strategies - best practice guidance of the London Plan*, there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (November 2005), Objective 1.2, reads: *'To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.'* *'Priority: High' 'Timescale: Immediate'*.<sup>4</sup> That Action Plan still applies. To achieve minimum standards requires a massive expansion of provision. So the AAPs and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.

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

**Allotments:** The *LBH UDP* recognised that there's *'an estimated requirement for up to 1552 plots of [additional] allotment land'*. This represents an additional 31ha, according to the *Atkins Assessment*, on which this is based [Atkins Vol. 1, para 8.67]. However, *Atkins Vol 1*, para 8.55 states: *'The way in which plots are promoted and publicised also influences demand. At present very little active promotion and publicity has taken place'*. Even to achieve the artificially low number of total plots required, every ward should have an average of around 175 plots (about 15 plots for every 1000 residents). For example, the three wards in South Tottenham currently have a combined total of 63 plots and hence require an additional 462 plots to meet needs. There are only 63 plots for the whole of N15 and only 22 plots in the N4 area of Haringey. There are no plots at all in Bounds Green, Bruce Grove, Harringay, Hornsey, Noel Park and Northumberland Park wards. The only site in St Ann's ward has just 8 plots, and the one site in Tottenham Green ward only 21 plots, therefore residents in those wards have little chance of obtaining a plot near to them. There are in fact 11 wards in Haringey which have less than 0.24 ha of allotment space per 1000 residents. Many residents are on waiting lists for allotments.

<sup>4</sup> The LBH website has maps of areas of deficiencies for various types of open space: [http://www.haringey.gov.uk/index/housing\\_and\\_planning/planning-mainpage/policy\\_and\\_projects/local\\_development\\_framework/openspace\\_rec.htm](http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm)

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

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

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

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

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

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

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

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



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

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

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

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

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

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

According to a report compiled by Haringey Council in 2013<sup>5</sup> there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41). Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, *'planning for further capacity within local primary and secondary schools as well as any special school provision will be an important component in ensuring that additional school place provision is joined up and sustainable'* (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: *'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School,*

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<sup>5</sup> [http://www.haringey.gov.uk/school\\_place\\_planning\\_appendices\\_2013.pdf](http://www.haringey.gov.uk/school_place_planning_appendices_2013.pdf)

*Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision...There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best' (pp. 69-70).*

### **3. Specific response to the *Tottenham Area Action Plans Regulation 18 Consultation Document: Northumberland Park AAP***

Northumberland Park AAP
<p><b><i>We want to guide the successful regeneration of Northumberland Park through proactive planning policies. Take a look at our Northumberland Park AAP before answering the following questions:</i></b></p>
<p><b>Q2 To what extent do you agree with our description of Northumberland Park presented in this document?</b></p> <p>We strongly disagree with the description given of Northumberland Park and its potential on pp. 5-8 of the document.</p>
<p><b>Q3 If you disagree or strongly disagree please use the place below to tell us why:</b></p> <p>There are several statements in the document about the fact that concentrations of social housing are viewed as a negative feature which should be addressed through 'mixed tenure' and 'mixed communities' policies. We would argue that the 'dominance of single tenure housing' in North Tottenham (p. 5) is <u>not</u> in itself detrimental or the root cause of the 'problems' of the area. The 'legacy of poor land use, typified by many 1960s housing estates' (p. 7) is not a fair representation of the views of many of their residents. The statement on the Northumberland Park AAP map, p. 8, at the bottom left corner, does not make sense: 'the mono tenure nature of housing has resulted in a lack of housing in this area'. Given the current housing crisis in London, there is an acute need for more social and truly affordable housing in Haringey.</p> <p>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' (p. 6) 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. We strongly disagree with the notion that a significant change in the housing mix of the Northumberland Park area through 'major estate renewal and the introduction of more private and shared accommodation' (p. 6) would improve the issues and problems of the area. 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...).</p>

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 lower income residents to rich neighbourhoods). **The conclusion of the majority of the studies carried out in the UK and in countries where similar policies have been carried out is that there is rather limited evidence that interventions in the housing mix alone can lead to greater social mix and to positive effects for deprived urban neighbourhoods and their residents, in particular tenure mix interventions in social housing estates.**<sup>6</sup> Often 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'<sup>7</sup>, for example through job opportunities.

Whilst it is true that residents in areas of concentration of social housing, such as Northumberland Park, suffer considerably worse outcomes than the national average for selected indicators of deprivation (e.g. income, general and mental health, educational attainment, benefit claims), the causal explanation for this does not reside with the fact that they live in a mono-tenural area. Sociological research has clearly shown that individual and family characteristics are more important than the *neighbourhood* in explaining individual life

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<sup>6</sup> See among others:

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

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.jrf.org.uk/publications/are-mixed-communities-answer-segregation-and-poverty>.

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/SERCPP002.pdf>.

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

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

MIXED COMMUNITIES EVALUATION PROJECT TEAM (2010) *Evaluation of the Mixed Communities Initiative Demonstration Projects. Final report*. London: DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-initiative>

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

<sup>7</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

trajectories. Research has even shown that in some cases mixing policies can have negative impacts on low-income or ethnic minority groups, because, through the influx of new residents and new services, such interventions may break social networks and endanger businesses catering for a low-income population or for specific ethnic minority groups, leading to more class or ethnic conflicts. Many sociological studies have since long shown that a degree of concentration may benefit particular social or ethnic groups, which means that an imposed de-concentration may break crucial community ties. The presence of family networks, small businesses, support organisations and informal networks can support the process of survival and of socio-economic integration or social mobility. Social mix policies were provocatively labelled 'faith-based displacement activity' by the respected LSE economist Paul Cheshire (2009), who argued that they treat the symptoms of urban deprivation and inequality rather than tackling its causes.<sup>8</sup>

Altogether, in the UK, there is thus 'substantial evidence that areas with more mixed social composition tend to be more popular, more satisfying to live in, and have better services than poorer areas', but 'to date the evidence is limited that neighbourhood has a large effect on individual outcomes, over and above individual and household factors. Nor is there robust evidence that neighbourhood mix per se or changes to mix (over and above other neighbourhood characteristics) is influential'<sup>9</sup>. The authors of the evidence review commissioned by the DCLG in 2010 on the evaluation of past mixed communities policy conclude that it is *not* evident that mixing communities are a more effective strategy for the regeneration of disadvantaged neighbourhoods than traditional neighbourhood renewal approaches – i.e. those which target public resources to particular areas to support integrated strategies of social, economic, and physical regeneration in partnership with local residents:

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

*(a) There should be continued support for 'traditional' urban and neighbourhood renewal, which might include a modest mixing element.*

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

*(c) Mix should be considered in existing areas through methods such as pepper potted-tenure change, tenure blurring, sensitive allocations policy and targeted fiscal stimulus'.<sup>10</sup>*

For the Northumberland Park area and for the rest of Tottenham, this means that:

- 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

<sup>8</sup> CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: [International Regional Science Review](#), 32 (3): 343-375, 2009.

<sup>9</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

<sup>10</sup> TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

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 the area. The approved development of the Tottenham Hotspur's FC has been done at the expense of the surrounding population's needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.

***In order to guide successful regeneration through proactive planning policies we want to know what further key issues, challenges and opportunities need to be addressed in Northumberland Park. Please take a look at our [key issues and challenges map](#) before answering the following questions:***

**Q4 In order to make Northumberland Park a more successful place what transport issues or opportunities do you think need to be addressed?**

The future Spurs development will add a lot of pressure on existing transport infrastructure. There is a danger of severe problems with the doubling of visitors on match days including parking problems. More buses and trains will be essential if the capacity is available. Proposals to extend the Victoria line to Northumberland Park have been made on previous occasions.

**Q5 In order to create successful places in Northumberland Park what housing issues or opportunities do you think should be addressed?**

Regarding the existing social housing stock in the area, see the comments above under Q2:

- 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 the area. The approved development of the Tottenham Hotspur's FC has been done at the expense of the surrounding population's needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.

Regarding the new homes to be built in Tottenham, the *Tottenham Area Action Plans Regulation 18 Consultation Document* seems to indicate that they should be overwhelmingly for private market rent, near private market rent, private sale or shared ownership. It is not acceptable to meet affordable accommodation targets with shared ownership or intermediate rent housing, both of which are out of the price range of low income families. We demand that the new housing to be built in Tottenham should be high quality and genuinely affordable. An affordable home is one that is affordable to any tenant earning the London Living Wage. 'Affordable' is not

80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. 70% of such new build affordable housing should be social housing. There should be a mix of unit sizes and types to suit local needs, based on evidence – e.g. more provision for large family dwellings, no over-provision of small flats.

A quality home means all of the following: secure; physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards i.e. Parker Morris standards plus 10% more space - and to outside garden space); in compliance with, and not exceeding, the density matrix as set out in the London Plan; built to 100% lifetimes homes standards. Design 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.

**Q6 What would make town centres in Northumberland Park more successful?**

The sentence 'High Road West has been identified as a specific...' (p. 6) is incomplete. The statement about 'innovative ways of improving the existing retail uses' needs to be clarified: what would this entail exactly? This should not mean the displacement of existing shops serving local needs to cater for high income consumers. The protection of independent shops and small scale retail should be explicitly stated as a goal in the AAPs, and improvements sought for via grants to the occupants. In that respect the 'retention of existing local services and professions' in the area mentioned on page 7 is key.

**Q7 How do you think sports and leisure needs in Northumberland Park could be best met?**

See generic comments in Section 2 above about the need for open space and sports facilities in Tottenham.

In Tottenham specifically there is a need for:

- much more low cost sports facilities,
  - a cricket pitch,
  - support for the Tottenham Community Sports Centre and Frederick Knight Sports Ground both based in Northumberland Park and managed by local people,
  - support for existing community sports clubs and societies
- Development of community sports in the Lea Valley, including supporting current user groups,
- the Spurs Foundation to commit to putting money and resources into the area, and working in partnership with local clubs and providers,

- local schools to commit to working in partnership with local clubs and providers, and to open up their facilities for public use,
- ensuring that the Northumberland Park School swimming pool is available for public use,
- the Bull Lane Playing Fields Community Plan to be backed and implemented,
- upgrading all playing fields and their ancillary facilities for public use,
- supporting the Selby Trust and other community centres in managing and developing their sports and leisure potential.

**Q8 What design and heritage opportunities and challenges do you think there are in Northumberland Park?**

Opportunities to create and extend Conservation Areas should be pursued. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list. The heritage and positive characteristics of the area should be preserved.

**Q9 What would make movement within and around Northumberland Park easier?**

The exact implications of ‘investment in the increased legibility of nature desire lines’ (bottom right of the Northumberland Park AAP map, p. 8) need to be clarified. The improvements of the East-West connections in the area should not entail the demolition of existing occupied residential or commercial buildings.

**Q10 What do you think could be done to increase job opportunities and the skills of local people in Northumberland Park?**

Reference is made in the introduction of the *AAP Reg. 18 Consultation Document* to the objective of creating over 5,000 new jobs: where, of what kind, and for whom would need to be specified in more depth, so as to ensure that most of these benefit the existing residents of the area. We agree that employment and education could be important elements of the regeneration of Northumberland Park if new employment and education opportunities serve the need and skills of the existing residents. All jobs created during and following development should 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.

**Q11 In light of the regeneration agenda in Tottenham, do you think there is the opportunity to redesignate employment land for other uses in Northumberland Park?**

The forthcoming review of Employment Land which is referred to on p. 7 of the document is a matter of concern. The acronym PTAL used on p. 7 should be spelled out in full in the document as it is not understandable for a lay audience (Public Transport Accessibility Level). The improvements in accessibility in North Tottenham should not lead to a mass conversion of employment land into housing land for the purpose of capturing increasing land values for private developers, as there is a need to (i) maintain all existing sources of employment in the Borough and (ii) maintain industrial uses in London to keep a diverse economy. Any release of employment land should be exceptional (e.g. site vacant, or derelict), minor and justified; and there should not be any loss of jobs or displacement of businesses without relocation options in

the immediate vicinity. There should be 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. 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.

**Q12 How could Northumberland Park's open spaces and biodiversity be improved?**

See generic comments under Section 2 above about open space facilities.

All possible steps should be taken to protect and enhance green and open space and disallow development on it, to address green space deficiencies, protect gardens from being concreted over, and develop greenery throughout the streetscape and on major roofs.

Increase in biodiversity often takes place on previously industrial land which is shown in many of London's nature reserves. These sites are important sources of biodiversity.

**Q13 What environmental and sustainability issues do you think need addressing in Northumberland Park?**

All new facilities (residential, commercial, social) to be environmentally sustainable, i.e. conform to highest carbon-neutral criteria.

**Q14 How could community facilities be improved in Northumberland Park?**

See generic comments in Section 2 above about social infrastructure, in particular GPs and schools.

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

**4. Specific response to the *Tottenham Area Action Plans Regulation 18 Consultation Document: South Tottenham AAP***

**South Tottenham AAP**

*We want to guide the successful regeneration of South Tottenham through proactive planning policies. Take a look at our [South Tottenham AAP](#) before answering the following questions:*

**Q15 To what extent do you agree with our description of South Tottenham presented in the AAP?**

The section of the document on South Tottenham (p. 9-10) is shorter than the one regarding Northumberland Park and includes only very generic statements. However we disagree with a number of points made (see comments below).



The map (Map 3) showing 'possible Character Areas' on page 5 is a very simplistic vision which does not represent the actual and desirable intricate mix of uses that should remain across Tottenham.

**Q16 If you disagree or strongly disagree please use the place below to tell us why:**

See generic comments in Section 2 above and in the boxes below.

**Q17 In order to make South Tottenham a more successful place what transport issues or opportunities do you think need to be addressed?**

**Q18 In order to create successful places in South Tottenham what housing issues or opportunities do you think should be addressed?**

Regarding the existing social housing stock in the area:

- 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 the area. The approved development of the Tottenham Hotspur's FC has been done at the expense of the surrounding population's needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.

Regarding the new homes to be built in Tottenham, the *Tottenham Area Action Plans Regulation 18 Consultation Document* seems to indicate that they should be overwhelmingly for private market rent, near private market rent, private sale or shared ownership. It is not acceptable to meet affordable accommodation targets with shared ownership or intermediate rent housing, both of which are out of the price range of low income families. We demand that the new housing to be built in Tottenham should be high quality and genuinely affordable. An affordable home is one that is affordable to any tenant earning the London Living Wage. 'Affordable' is not 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. 70% of such new build affordable housing should be social housing. There should a mix of unit sizes and types to suit local needs, based on evidence – e.g. more provision for large family dwellings, no over-provision of small flats.

A quality home means all of the following: secure; physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards i.e. Parker Morris standards plus 10% more space - and to outside garden space); in compliance with, and not exceeding, the density matrix as set out in the London Plan; built to 100% lifetimes homes standards. Design 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.

**Q19 What would make town centres in South Tottenham more successful?**

We disagree with the expression 'underperformance of the High Road' referred to on p. 5, which does not account for the successful small retailers which serve the needs of the low-income residents of the area and should be preserved. We strongly disagree with the statement (p. 9) that retail at Bruce Grove should be 'enhanced through a number of planning related interventions that respond to the development of larger footplate store retailers at Tottenham Hall and potentially Northumberland park' if this means the displacement or closure of small independent retailers which have served the local community. A 'reinvigorated and enhanced high street at Bruce Grove' (p. 4) should not mean the displacement of existing businesses and retailers

'A new gateway to Seven Sisters': what does 'gateway' mean?

**Q20 How do you think sports and leisure needs in South Tottenham could be best met?**

See generic comments in Section 2 above about the need for open space and sports facilities in Tottenham.

In Tottenham specifically there is a need for:

- much more low cost sports facilities,
  - a cricket pitch,
  - support for the Tottenham Community Sports Centre and Frederick Knight Sports Ground both based in Northumberland Park and managed by local people,
  - support for existing community sports clubs and societies
- Development of community sports in the Lea Valley, including supporting current user groups,
- the Spurs Foundation to commit to putting money and resources into the area, and working in partnership with local clubs and providers,
  - local schools to commit to working in partnership with local clubs and providers, and to open up their facilities for public use,
  - ensuring that the Northumberland Park School swimming pool is available for public use,
  - the Bull Lane Playing Fields Community Plan to be backed and implemented,
  - upgrading all playing fields and their ancillary facilities for public use,
  - supporting the Selby Trust and other community centres in managing and developing their sports and leisure potential.

**Q21 What design and heritage opportunities and challenges do you think there are in South Tottenham?**

Opportunities to create and extend Conservation Areas should be pursued. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list. The heritage and positive characteristics of the area should be preserved.

**Q22 What would make movement within and around South Tottenham easier?**

**Q23 What do you think could be done to increase job opportunities and the skills of local people in South Tottenham?**

Reference is made in the introduction of the *AAP Reg. 18 Consultation Document* to the objective of creating over 5,000 new jobs: where, of what kind, and for whom would need to be specified in more depth, so as to ensure that most of these benefit the existing residents of the area. We agree that employment and education could be important elements of the regeneration of Northumberland Park if new employment and education opportunities serve the need and skills of the existing residents. All jobs created during and following development should 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.

**Q24 In light of the regeneration agenda in Tottenham, do you think there is the opportunity to redesignate employment land for other uses in South Tottenham?**

The forthcoming review of Employment Land which is referred to on p. 7 of the document is a matter of concern. The acronym PTAL used on p. 7 should be spelled out in full in the document as it is not understandable for a lay audience (Public Transport Accessibility Level). The improvements in accessibility in North Tottenham should not lead to a mass conversion of employment land into housing land for the purpose of capturing increasing land values for private developers, as there is a need to (i) maintain all existing sources of employment in the Borough and (ii) maintain industrial uses in London to keep a diverse economy. Any release of employment land should be exceptional (e.g. site vacant or derelict), minor and justified; and there should not be any loss of jobs or displacement of businesses without relocation options in the immediate vicinity. There should be 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. 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.

What does 'address the emerging creative hub in the area' (p. 9) mean? Opportunities need to be given to existing young talents who reside in Tottenham, not just to 'creatives' from outside the area.

**Q25 How could South Tottenham's open spaces and biodiversity be improved?**

See generic comments under Section 2 above about open space facilities.

All possible steps should be taken to protect and enhance green and open space and disallow development on it, to address green space deficiencies, protect gardens from being concreted over, and develop greenery throughout the streetscape and on major roofs.

Increase in biodiversity often takes place on previously industrial land which is shown in many of London's nature reserves. These sites are important sources of biodiversity.

**Q26 What environmental and sustainability issues do you think need addressing in South Tottenham?**

All new facilities (residential, commercial, social) to be environmentally sustainable, i.e. conform to highest carbon-neutral criteria.

**Q27 How could community facilities be improved in South Tottenham?**

See generic comments in Section 2 above about social infrastructure, in particular GPs and schools. We support the proposed improvements to the civic facilities at Tottenham Green. We support the statement on the South Tottenham Map (p. 10) that the proposed regeneration of housing estates should result in 'better quality community provision'.

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

**We would like to be kept informed of the progress of the *Tottenham Area Action Plans and Site Allocation DPD*.**

**Please note: we may send additional supporting materials as an addendum by 24<sup>th</sup> March 2014.**