

Ref: (for official use only)	Local Plan Publication Stage Response Form	
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Name of the DPD to which this representation relates:

Alterations to Strategic Policies 2011-2026. Pre-Submission Version January 2016

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

1. Personal Details ¹	2. Agent's Details
Title	<input type="text"/>
First Name	<input type="text" value="David"/>
Last Name	<input type="text" value="Morris"/>
Job Title (where relevant)	<input type="text" value="Coordinator"/>
Organisation (where relevant)	<input type="text"/>
	<input type="text"/>
Address Line 1	<input type="text" value="7 Carrick Gardens"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text" value="N17 7AX"/>
Telephone Number	<input type="text"/>
Email address	<input type="text"/>
	<input type="text"/>

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation: **Our Tottenham network** <http://ourtottenham.org.uk>
Planning Policy Working Group

3. To which part of the Local Plan does this representation relate?

Paragraph Policy SP2: HOUSING Policies Map

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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. **Organisations affiliated to the Our Tottenham network** include (as of 1.03.2016):

- 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
- 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
- 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
- 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

See a description of our member at: <http://ourtottenham.org.uk/about/supporting-groups/http://ourtottenham.org.uk/about/supporting-groups/>.

This response, formulated by the **Our Tottenham Planning Policy Working Group** (a group of volunteers from various affiliated organisations monitoring planning issues and active on behalf of the network), as well as the **Our Tottenham Local Economy 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/>). This was followed up by two more Community conferences in February and October 2014. All the materials produced by the *Our Tottenham* network are available on our website. The **Our Tottenham Community Charter** and subsequent revisions are enclosed in **Appendix 1** of the present submission.

This response builds upon the previous responses we submitted:

- i. in March 2014, in response to the public consultation on *the draft Tottenham APP Regulation 18 Consultation Document*;
- ii. in March 2015, in response to the public consultation on four Local Plan documents, in particular the *Alterations to Strategic Policies 2011-2026 (formerly the Core Strategy), February 2015 version*.

With reference to the **criteria of soundness** of a Local Plan, we argue that several policies and proposals made in the **Alterations to Strategic Policies 2011-2026. Haringey's Local Plan. Pre-Submission Version January 2016** (thereafter referred to as **Alterations**) do not meet these criteria.

In what follows we specifically respond to the proposed alterations for **Policy SP2 HOUSING**, and in the next box, we specifically respond to the proposed alterations for **Policy SP8 EMPLOYMENT**.

Policy SP2 HOUSING:

1. Has the plan been positively prepared?

The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development (p. 63 of the Alterations document).

We argue that several policies and proposals made in the *Alterations* **do not meet the existing local communities' requirements** (from both residents and businesses). On the contrary, they represent an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. This particular affects Tottenham, as a significant amount of foreseen development is concentrated in this part of the Borough (see our separate response to the Tottenham AAP).

Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). The *Alterations* fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.

a) In several ways the *Alterations* do not fulfill, or they contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING, in particular: 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'.

b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment (http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf, p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The *Alterations* (Para 3.2.18) state that the Council 'aims to ensure an adequate mix of dwellings is provided' but there is no detail as to how this will be achieved, especially with regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered (see Tottenham AAP). Given the extensive need in Haringey for social housing for families, how can this approach be described as a 'strategy which seeks to meet objectively assessed requirements?' The Council says responding to family housing need is 'a priority for the Council', so the question is, will this plan address this in making provision of family housing for people living here?

The proposals for the "renewal and improvement" (including demolitions) of the council housing estates listed in SP2 point 10, p. 42, do not include comprehensive detailed options for re-housing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing need. A large consultation exercise carried out by the Council to gauge people's priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.²

There are serious questions which need to be answered regarding the concept of 'rent'. 'Affordable' levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to

² 2014 Tottenham's Future Consultation Report, at <http://www.haringey.gov.uk/regeneration/tottenham/tottenham-regeneration/tottenhams-future>

rent in many buildings (see next section).

c) The Council's Sustainable Community Strategy (2010-2016)³ states 'We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes'. 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. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the *Alterations* rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-2019⁴ challenges the concept of 80% market rent being a suitable ceiling of 'affordability', works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme⁵ focuses on identifying small infill sites within existing council estates and building on them subject to detailed consultation work with local residents.

The plan needs to provide enough social housing to meet the needs of Haringey's housing waiting list within a 5 year period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and sub-standard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.

In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any **further increase** in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need **at least 16,300 social rented units over 15 years or 1,066 per year**. This is more than 100% of the previous building targets **for all types of housing** before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing needs in other boroughs which are currently less crowded or in 'new town' type developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2.

Remarkably, Haringey Council's own Joint Strategic Needs Assessment states that 'to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required' (see <http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing#levelofneedofpopulation>). This simply cannot be achieved without overspill to other areas. But it is clear that the *Alterations*' target of only 40% of units to be 'affordable' is absolutely inadequate and there is little clarity that 'affordable' would include social rented housing which families in Tottenham on low incomes could afford.

³ http://www.haringey.gov.uk/sites/haringeygovuk/files/sustainable_community_strategy.pdf

⁴ <http://www.islington.gov.uk/publicrecords/library/Housing/Business-planning/Policies/2014-2015/%282014-06-03%29-Housing-Strategy-2014-2019.pdf>

⁵ <http://www.brighton-hove.gov.uk/content/housing/council-housing/new-homes-neighbourhoods>

2. Is the plan justified?

This means that the Plan should be founded on a robust and credible evidence base involving:

- *Evidence of participation of the local community and others having a stake in the area.*
- *Research/fact finding: the choices made in the plan are backed up by facts.*

The Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved (p. 63 of the Alterations document).

2.1 Evidence of participation of the local community and others having a stake in the area:

In asking if this plan is justified, one of the required criteria is 'evidence of participation of the local community and others having a stake in the area'. There is not enough evidence of community participation encouraged or promoted by the LPA in this final round of consultation which goes beyond a minimum. Independently of this part of our submission, we presented a more detailed analysis of the consultation process and its shortcomings (see text box below). The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended. This is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs for several weeks. The Council's borough-wide magazine *Haringey People* – which goes to households directly – did not include one word or reference to this consultation (see <http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-people-archive>). This would have been the most effective method for directly communicating with residents. The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet with their members.

The **Supreme Court in the Moseley v Haringey Council** judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' It is questionable as to whether this condition to allow for 'intelligent consideration and response' has been met with regard to this vital consultation on the Local Plan.

Consultation issues

The Council's 'Statement of Community Involvement' says that the Council will provide summaries in plain language. Although in correspondence with *Our Tottenham* last year, a senior Council officer expressed the view that to provide summaries would lead to confusion about whether the public should respond to the summary without reading the full text, we think summaries should have been provided at the library drop-in sessions and elsewhere (community centres, online, and in *Haringey People*) and that without them, it is difficult for residents to gain interest in or grasp the meaning and significance of the full text to which they are required to respond.

The Council did not pro-actively seek to involve non-English speaking communities with special meetings for example with Turkish translators. There was also some delay from the start of the consultation period in accessing translation apps for the documents online.

From the start of the consultation the Council were reluctant to provide any hard copies of the documents. They claimed that a set of the documents were available in libraries and that was good enough. Latterly they accepted it was not sufficient and provided copies to community representatives and groups. In addition, an extra two sets were provided to each of the open public libraries and a set was sent to elected councillors with the instruction that they should make their copy available to their electors.

The first tranche of consultation events were held at Haringey's public libraries during the day time. This prevented those with 9-5 Monday to Friday jobs from attending. At Coombes Croft and Alexandra Library our members observed that they were the ONLY members of the public

present. At Wood Green there were only 5. Cllr Clive Carter reported to Friends of Finsbury Park that only one person had been recorded as attending the consultation at Highgate Library. Later in the consultation period a number of evening events were organised. However, these were poorly advertised - mainly through the council website - and since most residents only use the Council web site, if at all, if they are looking for something they already want or know about, it was no surprise that they failed to attract people to get along. One evening event - held at 639 High Road, where the council's Tottenham regeneration team have an office - was attended by only one member of the public. In desperation, council officers resorted to standing on the High Road failing to entice passers-by inside.

There was no mention of the consultation in the February-March 2016 edition of the Council's borough-wide publication *Haringey People*. Not having a major article on the Local Plan in the one publication going to all households, and not placing advertisements in the local press, is a serious failure to engage as many people as possible in the consultation. Indeed, many residents may have known nothing about the consultation until some residents complained to the press (see http://www.thetottenhamindependent.co.uk/news/14246972.Council_criticised_over_Local_Plan_consultation_timings/).

The provided documents contain many mistakes. For example, in the Site Allocation DPD, section SA62 on Broadwater Farm gives a contradictory account in different parts of the page about who owns the land and neglects the private ownership of houses in Lordship Lane which may be marked for demolition under the proposed plan. The map for this page shows the boundary of the redevelopment zone going through the middle of a very large and important building, the Broadwater Farm Community Centre. Section SA15 concerning Whymark Avenue, N22, contains the extraordinary statement that 'no buildings need be retained' even though it contains a new block of mixed residential and retail units only about three years old which presumably had planning permission when constructed. Another mistake is that on the map Bruce Grove station is represented as a national rail station, when it has been a London Overground station for several months.

2.2 Research/fact finding: the choices made in the plan are backed up by facts:

We would like to challenge some key assumptions and evidence base used to justify the Alterations to Policy SP2 HOUSING under 3 broad themes:

- **Overall scale of housing growth and implications for existing and future social infrastructure**
- **The question of affordability**
- **The chosen approach to housing provision and to 'housing estate renewal'**

1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure

a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were 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>).

b) The plan seeks to fulfill arbitrary targets imposed by the London Plan. The latest revisions to the plan increased the number of housing units to be built by 83% which can only be done by imposing unsuitably tall buildings in North Tottenham, along the Lee and at Broadwater Farm; demolishing structurally viable buildings, some less than 40 years old; destroying communities and destroying the suburban character of neighbourhoods. The London Plan may well be revised when a new Mayor comes into office in May 2016. The need is to bring down these unrealistic targets for building in Haringey, especially in Tottenham, and redistribute building targets across the borough and the city. To meet the currently imposed targets means a form of building on many sites which if presented as an isolated planning application would be regarded by any reasonable precedent of the local planning committee as over-development.

c) There are several alternative ways of making a larger number of homes available in the borough as we point out under paragraph 4 below.

d) 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 Haringey⁶ (from 2011 census)

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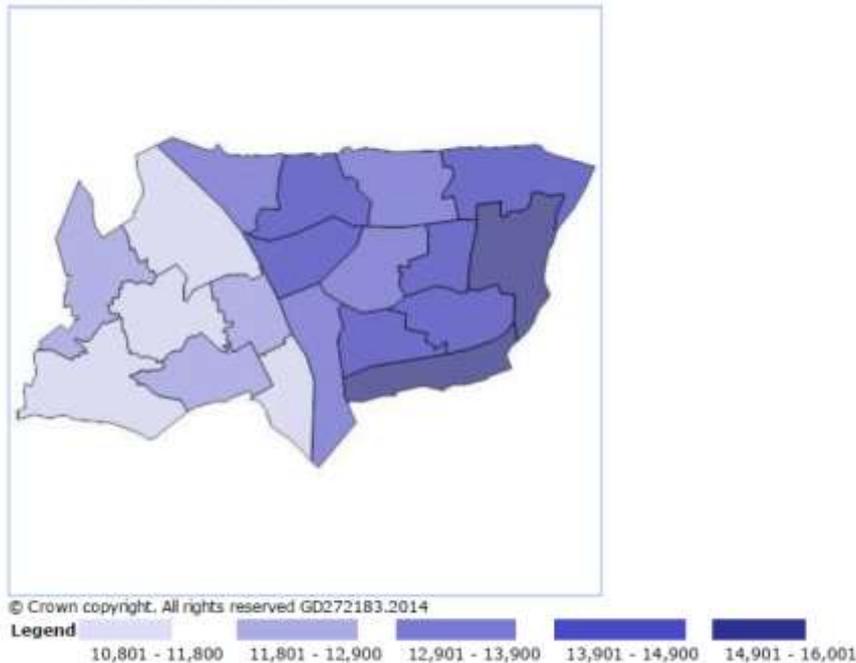
The wards highlighted in yellow are located in Tottenham.

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

⁶ <https://www.nomisweb.co.uk/census/2011/QS102EW/view/1946157250?cols=measures>

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



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.

2.2.2 The question of affordability

a) The assumptions in the **Housing Market Assessment** about growth rate of house prices and rents are far too low. Values applied to the viability calculations (i.e. how many 'affordable' units developers can reasonably be asked to build whilst leaving them an 'acceptable' profit) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that 'medium value' areas like Wood Green (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010

and now. But they have risen enormously! Average sales prices of residential property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19th 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since as noted in Haringey's Homelessness Strategy, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data shows Haringey lower quartile rents are £1,257 monthly and lower quartile GROSS earnings are 74% of lower quartile rents.⁷ This means that the conclusion of the **Housing Market Assessment** that most of the new housing will be 'unaffordable' for existing Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.

b) There is also considerable ambiguity about what the affordability of 'rent' means in the context of the 'affordable rent' concept. 'Affordability' is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is 'affordable' may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.

c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann's Hospital, in South Tottenham, the community group which formed the St Ann's Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for (i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.

2.2.3 The chosen approach to housing provision and to 'housing estate renewal'

a) There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities'. What does this mean? The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has also been demonstrated by research recently carried out by University College London (the Bartlett School of Planning).⁸

b) There is no evidence that the development of 'mixed' communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier response submitted in March 2015 (see text box below) a mass of academic and policy research evidence to show that drawing in higher-income residents to 'dilute' council estate populations leads to disruption of community networks, class-segregated living and social tension, rather than greater

⁷ <http://www.londonpovertyprofile.org.uk/indicators/topics/housing-and-homelessness/rents-and-affordability/>

⁸ See the EU-funded DIVERCITIES project reports, which show the incredible vitality of social and community networks in Tottenham: http://www.urbandivercities.eu/wp-content/uploads/2013/05/UK_WP5_FinalReport.pdf and http://www.urbandivercities.eu/wp-content/uploads/2015/08/UK_WP6_final_report.pdf

cohesion. The history of many London estates where this 'solution' has been applied testifies to this, and there is extensive academic research which confirms it.

'Tenure mix policies' as tools of 'regeneration': evidence from research

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.**⁹ 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

⁹ 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>

resources that may come with higher income residents (e.g. shops) either materialise or are beneficial to people on low incomes'¹⁰, 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.¹¹

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'¹². 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'.¹³

¹⁰ 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.

¹¹ CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: *International Regional Science Review*, 32 (3): 343-375, 2009.

¹² 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.

¹³ 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.

c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by *Architects for Social Housing* citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety¹⁴ and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive. But no objective criterion or argument is given about what constitutes the 'ideal' tenure mix, or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in <http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing>), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing in London, the central objective of the plan as **stated in Housing Policy SP2 can only be achieved if a high proportion of social housing is maintained**. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.

d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.

e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.

f) The rise in private sector rents, induced by the expectation of a 'gentrification' of Tottenham and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting lists there, and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in Haringey so as not to disrupt children's education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be the housing association's responsibility. There will then be a displacement effect on social housing waiting lists elsewhere in London as the housing associations struggle to find homes to re-house people whose homes they have sold for demolition.

2.3 Is it the most appropriate strategy when considered against the alternatives?

No.

There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (<https://architectsfor-social-housing.wordpress.com/page/2/>) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources. According to a report from the Urban Lab and

¹⁴ On their website, <https://architectsfor-social-housing.wordpress.com/>, Architects for Social Housing write: 'Since its regeneration following the 1985 riots, Broadwater Farm has had one of the lowest crime rates of any urban area in the world. In an independent 2003 survey of all the estate's residents, only 2% said they considered the area unsafe, the lowest number for any area in London. The estate also has the lowest rent arrears of any part of the borough. With £33 million investment, a community centre, neighbourhood office, children's nursery and health centre have been built, social projects, sports clubs and youth programs have been funded, concierges introduced, raised walkways removed, murals painted, communal gardens planted, transport links improved, shops and amenities made accessible, a more representative Tenants and Residents Association installed, and an estate isolated out on a flood plain of the River Moselle has been turned around and integrated into the Tottenham community'.

Engineering Exchange at University College London, 'there is a growing body of research suggesting that extending the lifecycle of buildings by refurbishment is preferable to demolition in terms of improved environmental, social and economic impacts'¹⁵. See also the *Our Tottenham Housing Factsheet: Demolition vs Refurbishment* <http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-v-refurbishment/>.

Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see <https://www.sovereign.org.uk/about-us/strategic-asset-management/>). We would expect to see a similar assessment of whether the Haringey Plan's proposals for estates such as Northumberland Park or Broadwater Farm represent best value for public money, taking into account also the intangible *social* costs and benefits of each alternative such as keeping the community together and continuity of children's schooling. For one specific group of estates, the 'Orlit' homes in Bounds Green, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment **is technically feasible**.

Much greater attention is needed in the *Alterations* to the possibility of creating extra low-cost homes and reducing rent levels by:

a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops owned by the Council.

b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.

c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last a year with a week's vacant period in between. This factor alone could 'provide' the equivalent of an extra 700 homes just by reducing the vacancy rate). It could be done through a non-profit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.

d) buying empty and hard-to-sell homes to let to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.

e) facilitating self-build and community non-profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has chosen to rely, is presented as 'the only show in town' and used as justification for failures to implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.

f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.

g) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing

¹⁵ 'Demolition or refurbishment of social housing, a review of the evidence', Oct. 2014

stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.

h) logistical help for older people who own much larger homes than they need (3-5 bedrooms) to let rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.

i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.

j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting, and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.

k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded via the private sector element of the development.

If the intention is to have a genuinely 'mixed community' which meets the housing needs evidenced in many reports, the Local Plan should include these other options and ideas.

Regrettably the phrase 'mixed community' appears to be used in the context of the Haringey Local Plan in the way critiqued by some academics 'who question the evidence base for social mix policies and rhetorics that advance processes of gentrification' (*Mixed Communities; Gentrification by Stealth?* Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).

3. Is the plan effective?

This means the Plan should be deliverable, embracing:

- *Sound infrastructure delivery planning;*
- *Having no regulatory or national planning barriers to delivery;*
- *Delivery partners who are signed up to it; and*
- *Coherence with the strategies of neighbouring authorities.*

The Plan should also be flexible and able to be monitored.

The Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The Plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Plan should make clear that major changes may require a formal review including public consultation.

*Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report (p. 63 of the *Alterations* document).*

We have several concerns regarding the effectiveness of the proposed **Alterations**.

a) The **Alterations** will result in expulsion of many residents who will be 'priced out' of Haringey into neighbouring areas or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.

b) There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young

children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre¹⁶ and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building.

Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided. There are fine aspirations about traffic and the infrastructure (para 3.1.19 of the *Alterations*) but much of this does not relate to real experience. Para 3.1.19 states that 'the £37m Tottenham Hale transport scheme has sought to reduce the impact of traffic on the local area, and increase capacity to cope with future demand. This will enable the regeneration of the area as set out in the Area Action Plan...' The Tottenham Hale gyratory works are complete, yet the traffic is as gridlocked as ever, and access routes, such as Ferry Lane are extremely congested. How will an additional 5,000 homes, (possibly an additional 10,000 people) be accommodated?

c) According to Cabinet papers revealed to the public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on **a variety of actors and development partners** in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community partners such as coops, community land trusts or social enterprises.

Is it deliverable?

Many of the *Alterations* are potentially not deliverable.

a) The plan involves serious over-development of many sites as already stated in point 2(d) above.

b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.

c) The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being 'beaten down' in negotiations on the proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development.

d) The *Alterations* reinforce the fact that is a one-dimensional plan which relies on private developers and a buoyant housing market to achieve its objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?

e) Part of developing alternative approaches would be to examine eventualities which might occur – in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined

¹⁶ In Site Allocations DPD SA62, the community centre building is mainly within the development zone, but curiously the boundary actually goes through the building. There is no commitment that the masterplan will ensure preservation of the community centre.

zones.

f) Haringey's proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.

Is it flexible?

The *Alterations* make the plan inflexible since it is one-dimensional as described above in paragraph d.

a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.

b) There is nothing in the plan to say what will happen is the envisaged strategy (overall or for specific sites) cannot be achieved. We know from the Council's latest proposal for a Joint Venture Company approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the market affects one particular private sector partner, the one which will be chosen as 50% owner of the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.

c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late 'noughties' caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.

d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp decline in market values and 'lettability' in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in Northumberland Park. Homes being left empty could lead to dereliction and social problems (such as a 'sink estate' reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.

e) Our over-riding concern is that refurbishment should always be considered as an option alternative to demolition.

Will it be able to be monitored?

We have concerns that the *Alterations* cannot all be properly monitored.

a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the *Alterations* says nothing about how much 'affordable' housing will be built on each main site. This is also the case in the Site Allocation DPD and in the Tottenham AAP.

We would expect that at the least, targets for 'affordable' units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area. We also note that it is not clear whether the 'affordable' percentage target of 40% is calculated as 'new build affordable/total new build' or 'new build affordable/(total new build minus the number of social rent properties demolished or amalgamated into

larger units)'.

b) The 'housing trajectory' graph (Appendix 1, p. 58 of the *Alterations*) which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the 'affordable housing' proportion of the total cannot be monitored against the target year by year.

4. Is the plan consistent with national policy?

As stated above, the *Alterations* fail to demonstrate how they will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).

The *Alterations* fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the borough, in Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.

Equalities legislation:

The effect of the *Alterations* would be an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. National policy (the Equalities Act) would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact that the plan will 'dilute' and drive out the existing residents of Tottenham means that negative impacts will disproportionately affect ethnic minority people. Appendix C to the *Consultation on Haringey's Draft Housing Strategy 2015-2020* also demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states:

'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east. Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the general population of Haringey... The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.'¹⁷

We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory, given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year.¹⁸ Such incomes clearly make so-called Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is the GLA's affordability criteria, see page 53 of *Appendix C*).

We believe that the policy of demolishing council estates therefore breaches the commitment in Haringey Council's Equal Opportunities Policy of April 2012 to the fair provision of services. Paragraph 3.2.2 of

¹⁷ *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C. Page 12.*

Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C

[http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/\\$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf)

¹⁸ *Ibid.* Page 58.

Haringey's Local Plan: Strategic Policies 2013-2026 states that:

'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live.'¹⁹ In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan. It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.

We would also note council plans to house more homeless families outside London (see Haringey Council's *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18*). (This was a report made to the Cabinet as part of agenda papers on 16/12/2014)²⁰. Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing numbers of Haringey's homeless families being forced out of London. This 'social cleansing' aspect, adds to the discriminatory nature of the proposal to demolish social housing. As Appendix C of the *Consultation on Haringey's Draft Housing Strategy 2015-2020* states²¹ 'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.' Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory nature of the Council's plan for Northumberland Park and Tottenham as a whole.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

As a consequence of the arguments presented above:

- **Alt49 to Policy SP2 (5); Alt61; Alt62; Alt 63:** 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.
- **Alt50 to Policy SP2 (6); Alt59:** we disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, 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 in Haringey. A truly 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' should not be defined as 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.
- **Alt53 and Alt64:** we strongly disagree with the approach embedded in the rewording of Alt53

¹⁹ *Haringey's Local Plan 2013-2026*

http://www.cartogold.co.uk/haringey/text/strategic_policies_2013_doc/03_people_ahoc.htm#3.2 Paragraph 3.2.2.

²⁰ *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18* at

[http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/\\$ADocPackPublic.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/$ADocPackPublic.pdf) page 205

²¹ *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C, page 5.*

and Alt64 about housing estate 'renewal and improvement', for reasons explained at length in the previous section. See also 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. We support Haringey Council's objective as laid out in para. 3.2.2, Policy SP2 HOUSING that 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'. 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* (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 units and no displacement of existing tenants as part of any plan for an estate. The proposed wording 'reprovide the same amount of social housing on an equivalent floorspace basis' does not guarantee those principles, and should be rephrased.
- There should be no demolition of structurally sound homes.

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Extensive work done by the *Our Tottenham* Planning Policy Working Group on planning issues, building on a network of 50 key community groups, residents' associations and other organisations active in Tottenham.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature

**David Morris, for the
Our Tottenham Planning Policy Working
Group**

Date:

4.03.2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Our Tottenham network** <http://ourtottenham.org.uk>
Planning Policy Working Group

10. To which part of the Local Plan does this representation relate?

Paragraph Policy **SP8:
EMPLOYMENT** Policies Map

11. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes No

Please tick as appropriate

12. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.
 If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy SP8 EMPLOYMENT:

In March 2015, in our response (no. 818)²² to the public consultation on the **Alterations to Strategic Policies 2011-2016 (version February 2015)**, we made detailed comments with regard to the sections and policies which concerned employment land. We challenged the **evidence base** upon which changes to these were made. We wish to reiterate these comments here and argue that the alterations proposed under policy SP8 are **not sound** because they are **not positively prepared or justified**. The alterations are based on the **Haringey Employment Land Study** update which was released to the public in February 2015 (available here: http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_employment_land_study_-_final_feb_2015_0.pdf). We have identified a range of serious concerns about the **Haringey Employment Land Study** update which we believe need to be addressed before any Alterations to the Strategic Policies are made, and which seriously challenge its reliability as a source of evidence informing the present **Alterations**:

- 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 the March 2015 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).

²² Available here: http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sp_overall_response.pdf and http://www.haringey.gov.uk/sites/haringeygovuk/files/our_tott_network_-_pp_working_grp_sp_detailed_response.pdf

- 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 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.

13. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

As a consequence of the arguments presented above:

- **We strongly disagree with proposed amendment Alt71** which decreases the forecast demand of new industrial workspace (B use classes) from 137,000 sqm to 23,000 sqm (which is even lower than the 32,000 sqm mentioned in the February 2015 version of the **Alterations**). While the amendment has come from the update of the **Haringey Employment Land Study** (para. 7.11), we have identified a range of serious concerns about that study (see above). It seems entirely counterproductive to reduce ambition for new employment floorspace at a time when Tottenham's population and economy is projected to grow so rapidly. **This proposed amendment should be withdrawn pending a new full review of Tottenham's industrial land.**
- **We strongly disagree with proposed amendment Alt72**, which foresees the proposed downgrading of the employment land status of Crusader Industrial Estate N15; High Road West N17; part of Vale Road/Tewksbury Road N15. The **Haringey Employment Land Study** describes these sites as well occupied and well performing in its description of individual industrial sites from p. 23 onwards:
 - Crusader Industrial Estate is the site of Haringey Council's investment in fashion and textiles; both sectors requiring industrial workspace. [Elsewhere, it is mentioned that 'some industrial estates are at risk of being converted to alternative uses. This is evidenced with Crusader Industrial Premises not providing leases of more than 5 years, which indicates that the landowner may have other intentions for the site's future use' (p.18). Retaining this site as employment space will therefore require strong planning policy protection to prevent owners driving out existing uses and preventing investment through the use of short term leases.]
 - High Road West is described as 'well occupied and is therefore serving the needs of local businesses' (p. 27).
 - Vale Road/Tewksbury Road is the site of unplanned warehouse conversion as well as 'significant swathes of the site are still in active employment use however and should be protected for ongoing employment use' (p.30).

If the protections of these sites are removed, it is likely that their functions will be damaged through housing and mixed use development. There is a strong need for industrial land in London, and these well performing areas should continue to be protected as required by the London Plan. The Council risks its aspirations for regeneration damaging the strengths of its existing local economy – these strengths are acknowledged in regeneration and economic development strategies but not in its planning policies. All of the strengths mentioned in the Opportunity Investment Fund for Tottenham Factsheet (http://www.haringey.gov.uk/sites/haringeygovuk/files/hc_25783_opportunity_investment_fund_v3_web.pdf), for instance, require industrial workspace which the Strategic Policies do not sufficiently protect: 'artisan bakers, craft breweries, gourmet popcorn manufacturers, royal uniform makers and high end furniture makers' (Tottenham Opportunity Investment Fund factsheet).

- Alt77: the **proposed amendment to para. 5.1.18** introduces updated jobs targets for Haringey, introduced by the Further Alterations to the London Plan, which forecast 22,000 new jobs between 2011 and 2036, which would give the highest employment growth rate of all London boroughs. Steve Kelly from Haringey Council himself said these growth rates could not be delivered in its response to the consultation on the FALP (<https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf>). The **Haringey Employment Land Study** says that this scenario 'would result in levels of B use class employment growth that Haringey has not witnessed in the past two decades and would result in significant additional employment land requirements that would be difficult to provide for given the limited availability of sites and the Borough' housing and regeneration policies' (p. 49). The Study recommends that Haringey therefore does not plan on the basis of the FALP employment projections, but the much lower trend-based projections. This quote also confirms the view that Haringey's – and Tottenham's specifically – supply of industrial land is being sacrificed to deliver its housing and regeneration priorities. This will have severe impacts on the nature and character of Tottenham for years to come, weakening the prospects for sustainable and inclusive development that actually benefits local people and local businesses.
- **Proposed amendment Alt 78 (para. 5.1.23)** makes reference to a stakeholder consultation done as part of the **Haringey Employment Land Study**. The study should list who was included in this consultation. We do not believe existing businesses were part of this consultation. Policies in

support of workspace for SMEs should not just engage real estate and commercial developers in considering how to deliver new affordable workspace but also engage existing businesses and business groups about what their needs are and how existing low cost workspaces can be retained and supported. **Alt 78 should confirm how existing businesses and businesses have been consulted and what the council's policies are in relation to existing low cost workspace.**

Without prejudice to our broader concerns, we are also concerned that some of the recommendations of the updated **Haringey 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 **Haringey Employment Land Study** update 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.

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

14. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

15. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Extensive work done by the **Our Tottenham Local Economy Working Group** on local economic and employment issues.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

16. Signature

**David Morris, for the
Our Tottenham Planning and Local Economy
Working Groups**

Date:

4.03.2016

Appendix 1: Our Tottenham Community Charter and subsequent modifications/action points

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, 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, 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