

## Formal Response to Local Plan Consultation

I am writing to object to Haringey's Local Plan.

I am Alan Stanton and live at 81 Holcombe Road, Tottenham, London N17. I have lived in Tottenham for some 33 years, For sixteen of those years I was an elected councillor and I mention this to explain that I have some knowledge of the pressures and issues of some of my fellow local residents who shared with me their experience and problems in respect of, for example, housing, unemployment, homelessness, failures and shortcomings of local services. Also in respect of infrastructure including: transport; parks, playgrounds and open spaces; designing out crime; health provision; education; retail shopping and services; and other planning issues which impinged on their lives (and often on mine) as community members.

I read the documents and discussed them with family, some local friends, some neighbours and other residents. I am aware of a number of other objections which have been sent in, many of which I agree with and strongly endorse. What I write here is only a summary of some of my concerns and objections, and my challenge to the Soundness of the proposed plans in general and in relation to specific matters. It fails the "Soundness Test".

Flawed Consultation - I also consider that it is legally flawed in failing to meet the requirements on consultation recently laid down by the UK Supreme Court.

I am not suggesting that Haringey staff carrying out the consultation have deliberately tried to obstruct public involvement. However, I do think that there have been inadequate resources allocated to the process by the Council, and the aim giving sufficient timely and clear information to residents so they can understand and grasp the sheer size and enormity of what is proposed and decide whether or not to make a representation.

In my view it is only reasonable for a local council to adopt a proportionate approach so that the larger and more far-reaching the proposed changes and plans, the greater the need to ensure the widest dissemination of information, and to make consultation as simple and straightforward as possible for as many residents as are potentially affected.

Again in my view, the Council has failed to take this proportionate approach. A fact that as a former councillor I regret.

In summary, these plans – especially for the area where I and my wife live - are simply enormous in their potential. And this applies whether in numbers of homes and other buildings to be demolished and built; in the physical scale of the areas affected, and in the timescale of the plans (some fifteen-twenty years). These plans are likely to lead to one of the largest programme of changes the area – and the borough has seen for many decades.

Not to allocate sufficient resources to consultation is an indication of a massive failure. And one

which will be difficult to rectify as people learn about the implications for their own homes, streets, and neighbourhoods.

It is also clear that the overall plans for Haringey are discriminatory as between the poorer east and richer west of the borough. That is evident even in the basic tools used to conduct the consultation. The “digital divide” between residents who routinely use the internet and fill in forms online and those who do not, is likely to match the divide between those areas of the borough which will not on the whole be the victims of these plans, and those whose homes and neighbourhoods are likely to suffer planning blight and social dislocation, community disruption, and displacement or the next twenty years.

***Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?***

There is now a large body of academic research which challenges the hypothesis that the types of plans proposed by Haringey will achieve “Mixed Communities”. I particularly refer to the collection of essays called *Mixed Communities: Gentrification by stealth?* (Policy Press 2012). I do not accept in its entirety an argument that gentrification is a negative. I am however persuaded by the argument that developer-led and market-led plans (such as those now envisaged by Haringey Council) have the effect of deepening class and racial divides and further segregating class, race, age; and ethnic divisions.

Haringey is one of the most unequal boroughs in London. Our local Council should not be pursuing plans which widen that gap. Or if they achieve an apparent narrowing, are likely to do so only by displacing poorer residents who will no longer be able to afford to live here.

Haringey should in any case begin by assessing and trying to meet the needs of its existing residents. Instead, it is my view that these plans are part of a political agenda for “social cleansing” which has taken place in other parts of London where the class and racial divides are accentuated by the displacement of poorer residents whose homes are demolished, destroyed or sold-off to private companies.

Most of the people displaced or whose homes are demolished to make way for new privately-owned blocks and towers will be unable to afford the new flats. Which are in any case being planned for one and two bedroom private “apartments” in areas where there is enormous pressures for family housing - often large families.

It is likely that even the maintenance charges are likely to operate to “select-out” less well-off residents.

Not only does the plan not meet the community’s requirements, it is vague and unconvincing in what these needs are and what alternative options may be available.

The plan proposed is actually a large-scale undeclared experiment with people’s lives and futures. It treats them as experimental objects in a social engineering scheme where none of the potential risks

and dangers have been considered, let alone set out so that local residents can be aware of them.

I do not deny that there is a need for more homes to meet the housing targets – and needs - of a growing population. Some of Haringey population may well be by poorer people displaced from inner London boroughs which are engaged in the same processes.

However, there are alternative options to building more homes. Many have been successfully pursued or approved by Haringey over recent years. Here I am thinking of options such as sensitive infill, backland developments, brownfield site developments, additional of extra storeys to existing buildings etc etc. All of which can and often have been achieved with sympathy to the scale, mass, and character of existing buildings and areas.

I accept that not all have been in harmony with local heritage, and conservation area requirements. But it is a serious flaw in the proposed new local plan that conservation is not given a far higher priority. The plan fails to demonstrate and the character of Tottenham in particular will be protected.

So overall the plan is focused on pushing through demolition, and enforcing a ‘top-down’ social and physical re-engineering of large parts of Tottenham to the detriment of current communities. It appears from the plans, drawings and models I have seen that the new towers and blocks are likely to be what the architect and urbanist Jan Gehl has often described as “birdshit” architecture. By which he means tall buildings apparently dropped from the sky without any proper relationship to the existing uses and street-level living.

The conventional wisdom about densification near stations appears to collude with this view, seeing or welcoming new residents attracted to buy these apartments, principally as commuters travelling to and from work, rather than as residents who wish to join a cohesive community.

Most crucially the plan does not respect the overwhelming views of Tottenham’s residents (as made clear in the Soundings run consultation) that their priorities were for the provision of Council and social housing at a genuinely affordable rent. Housing Policy 3.2 states *‘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’*.

I entirely approve and endorse this aim. But I do not see how the proposed local plan can actually achieve it. So an aim and priorities clearly expressed by local people will not be achieved. In fact it is highly likely that it will achieve the reverse.

By focusing on and promoting private sector development the result is likely to be neither affordable or accessible homes for to the thousands of families who now live in Tottenham - some on the housing waiting list. While others are in private rented accommodation which is both insecure, and is highly likely to be rising in cost to match the “uplift” in property prices our Council are so pleased about.

The “Generation Rent” problem has long been a problem in Haringey. Giving it a new name has sharpened awareness of the damaging impacts it has – for example on family life, health and

children's education, where renting leads to increased churn of households and lack of stability for residents.

I mentioned my objection to the term "Mixed community" being frequently applied to Haringey Council's plans. I now go further and suggest that – based on the academic research I have read – that this term is untruthful.

The Local Plan, (Para 3.21.18 of the Alterations to Strategic Policies, Pre-submission version January 2016) states 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. It appears 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 on earth 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?

Alongside the Housing Policy, The Council's Sustainable Community Strategy (2010-2016) states 'We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes' for people in housing need. In Haringey this means social rented housing. But no alternative option which demonstrates how this might be achieved is included in the plan even within the current housing and planning environment. How can it be 'the most appropriate strategy when considered against the alternatives' if no alternative has been proposed or evidenced?

The "Our Tottenham" community group has made its own Submission which discusses further housing aspects of the plan great detail. I refer you to that document which I in large measure, endorses and complements my own objection submission.

### ***Is the plan justified?***

No. This whole plan is predicated on a vision of Tottenham driven and underpinned by private property development. This is Plan A. But there are no Plans B nor C. So the risk is enormous and the people whose lives and futures are on the line are the present residents. If as is likely, the plan displaces people then the existing residents will not only fail to have their needs met; their lives may be severely damaged.

At no point has Haringey asked how far we have Mixed Communities at present. To assume that we don't and that social change is needed to achieve this, shows a high degree of ignorance as well using confirmation bias with the evidence. If there an implicit aim of changing the social mix of our communities in Tottenham then the evidence and aims should be made explicit so local residents can understand and comment on this.

There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities' But Tottenham is already a mixed community – but evidently not

mixed in the way the Local Authority prefers. N15 and N17 are reputed to be the most diverse postcodes in Europe. People from all ethnicities, races, religions, professions, jobs and classes live side by side as homeowners, renters, council tenants, or in temporary accommodation.

The council estates are well-integrated into our areas, and are equally mixed – a fact accelerated by right to buy which has meant estates are now more socially mixed, including mixed tenure. Yet at least two of these are proposed for demolition with no detailed alternative being provided for the hundreds of displaced families. How can the plan deliver its objective of providing for the housing needs of the Haringey population with extensive private sector development and council estate demolitions? The plan offers no detail on these critical points.

The whole process underway in Haringey reminds me of a poem by the German playwright Bertolt Brecht. He wrote that:

*“... the people  
Had forfeited the confidence of the government  
And could win it back only  
By redoubled efforts. Would it not be easier  
In that case for the government  
To dissolve the people  
And elect another?”*

Haringey’s Plan appears to start from the position that the problem with Tottenham is its people. A “problem” because they are poorer and not being able to buy their own homes. People who have therefore let down the Council and its planners. So our elected Council will “dissolve” the existing people; demolish or sell off their homes. The Plans will provide shiny new homes in towers for shiny new people who will form new communities.

This betrays not just a lack of understanding, a lack of liking and respect for the people who now live here. It also assumes some sort of implicit trickle-down theory will work. And that changing the social make-up of the area will somehow benefit everyone in it. If this is the implicit theory being used, it is open to serious challenge.

A required criterion for this plan is ‘evidence of participation of the local community and others having a stake in the area’.

There is little evidence of broad based community participation encouraged or promoted by Haringey in this final round of consultation. 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 poorly publicized, and were very poorly attended and run at times inconvenient for many working people. The lack of participation at these sessions 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 – which goes to households directly – did not include one word or reference to this consultation - <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

very hard to read on line, and the on line forms are extremely difficult to complete. The number of printed sets of documents is limited yet this is the most effective way to read this complex material.

***Is it based on robust and credible evidence?***

No. 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.

Please see the Our Tottenham submission for a detailed response regarding the assumptions in the plan which emanate from the Housing Market Assessment which are, it is argued, far too low. It describes how prices have increased, and agrees with the conclusion of the SHMA that most of the new housing will be 'unaffordable' for existing Haringey residents.

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

No. The Local Plan does not really give alternatives to private property development, high density/high rise flats and estate demolitions. Eleven alternative ideas have been set out in the Our Tottenham submission. If the intention is to have a genuinely mixed community which met the needs of local people on waiting lists and/or living in poor private sector or temporary accommodation, the Local Plan would include these other options and ideas.

***Is the document effective?***

Not for local people who need decent, affordable homes. It is likely to result in many residents being 'priced out' or 'demolished out' of the area and possibly 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.

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. The assessment of the need for school places does not appear to reflect the implications of building high rise, largely one or two bedroom flats. What provision will there be for community facilities? Whilst the Council's recent school planning places document suggests an increased child population because of the regeneration, 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. The outcome of this policy is likely to be a shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use.

In any event, especially for Tottenham Hale, the plan indicates that the bulk of new developments will be one and two bedroom flats. So there is a serious mismatch between the policies and the plans.

There is a very serious lack of health provision, particularly in Tottenham Hale. Continuing and probable greater lack of affordable housing will have a knock-on effect on the availability of trained health staff. A further 5000 homes is now proposed but there is no detail of how services will be provided. The long struggle in getting even a GP practice on Hale Village indicates the serious obstacles to this.

The Plans contains warm words and aspirations about traffic and the infrastructure (para 3.1.19 of the Alterations to Strategic Policies, Pre-submission version January 2016). It appears to relate as much to real experience as rainbows to crocks of gold. to rainbows but much of this does not relate to real experience. This section 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...'

Now that the Tottenham Hale gyratory works are complete, the traffic can be as heavy and sometimes gridlocked as it used to be. Access routes such as Ferry Lane are very congested. How will an additional 5000 homes, (possibly an additional 10,000 people) be accommodated?

I often wonder if any of the planners and others involved in the local plan process have ever walked around the streets within easy walking distance of the Tottenham Hotspur ground on a matchday as displacement from the matchway controlled zones expands. There seems to be a Council fantasy that improved transport links will solve this problem.

But what we face is not only a significant enlargement of the stadium capacity but the aim by the football club to run a 365 days a year events programme. Does anyone seriously consider that the transport improvements planned will be able to cope with such an increase? Have they visited the area around the Etihad Stadium in Manchester during a pop concert? (I made a point of doing so.) Or visiting the O2 arena which had a new tube line meet the demand?

No doubt we will hear more about car-free developments. It appears to me that this shows either a degree of hypocrisy or perhaps selective perception. Take for example Hale Village, where I understand that parking spaces are available for those who can afford to pay a very high premium. Or consider few people who are lucky enough to live in public housing with a free parking scheme. And there are those with a driveway, garage or back entrance which enables them to park off-street.

### ***Is it deliverable?***

No.

Let me take one area I know a little about.

For many years – including when I was a councillor - I tried to raise the issue of potential urban flooding. The area where we live is a river valley. One of the delta streams of the Moselle Brook runs in a culvert at the rear of our home. I think we have been extremely fortunate not to suffer the flash flooding which from time has badly affected other parts of London. With other reasons flooding elsewhere in the UK.

Some of the sites in Haringey now proposed for very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will surely increase the flood risk with more land built over and unable to absorb even minimal amounts of rainwater (given London

clay) in gardens and landscaped areas.

I am sure there will be many assurances about flood defences being adequate. But that of course is what we've seen and heard in other towns and cities. Places which suffer the consequences of so-called "once in a hundred years weather events". But which turn out to be once every few years. I suggest that this is probably the only area of the Plan where "trickle-down" theory may actually work.

Meanwhile the Council continues to pursue the irrational aim of "naturalizing watercourses". (Page 51 Development management DPD) I take this to mean deculverting. This ignores the very good reasons why culverting was done in the past. So presumably the fans of deculverting don't have a culverted stream near their house. Nor are they in the market to buy or sell such a property at a time when rapid climate change is science not opinion?

Then let's take the Council's announced preference for a very small number of development partners. This makes the plan vulnerable to being 'beaten down' in negotiations on the proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development. Everyone in this field knows about the changes in legislation which favour developers. And the use by developers of viability assessments which inevitably "prove" the financial impossibility of many –if any - affordable units. (Actually unaffordable.)

At the same time Haringey is pressing ahead with plans for a joint-venture company to lease some public social housing. Apparently ignoring the obvious point that owning land on an unencumbered freehold is the best way to stay in control. A fact which I doubt will have escaped either councillors or staff who are freeholders.

Haringey has put forward a broadly one-dimensional plan. It relies on private developers and a buoyant housing market to achieve its objectives. In North Tottenham around the Spurs stadium the focus is narrower still – with concomitantly higher risks. Sport-led development is by no means a magic wand with guaranteed success. Yet the Council has out "all its begs in one ask it" by partnering with Spurs and assuming the clubs plans will not only succeed but "trickle down" to regenerate the local area. For the sake of local people I hope the plan succeeds. Again there seems to be no Plan 'B'.

Nationally there are already concerns that UK economy may not be recovering at the rate expected. There is no guarantee that a further recession might not happen, especially given the situation with possible exit from the EU.

In my view it is the responsibility of the Council and its planning staff to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?

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, would leave Tottenham blighted, with many communities caught within red lined zones.



It also needs to be asked as a matter of urgency whether the red-lines on the plan are having a damaging effect. For example on the willingness of people to buy and invest, and for banks to give loans.

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 and around 140 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.

### ***Is it flexible?***

Absolutely not. The reverse appears to be the case. It is one-dimensional as described above, with too much reliance on large private developers. Should the economy go into a downturn, where property prices fall, what will happen to these plans? Alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards are now well-tested strategies for this. Estates could be refurbished and improved instead of being redlined for demolition.

A further issue is the need for flexibility if the new Mayor of London wants to make substantial changes to the London Plan. For example, at least two candidates have declared themselves in favour of a strict target of 50% or more 'affordable housing' so that the plan's revised target of 40% may well be at odds with any revisions to the plan that the new Mayor may put forward.

### ***Will it be able to be monitored?***

No. 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 in Appendix 2 says nothing about how much 'affordable' housing will be built on each main site.

The 'housing trajectory' graph 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.

### ***Is it consistent with national policy?***

The Plan fails to demonstrate how it 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.

The issues topic of climate change avoidance and mitigation was completely ignored when it came to the Tottenham Hotspur Stadium. Haringey aspires to be a 'green' Council but faced with a large developer saying 'no-thanks' the Council and its planners roll over.

National policy would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, it is likely the plan will not support existing residents of Tottenham and will disproportionately affect ethnic minority people.