

## **Formal Response to Local Plan Consultation – Soundness**

Having read the documents and discussed the plan at our residents' association meeting, I am setting out in summary reasons why I do not think the plan meets elements of the 'soundness' test. A more detailed document which challenges the soundness of the Local Plan, is being submitted by Our Tottenham, of which Dowsett Estate Residents' Association is an active member group. In my capacity as Chair of our association I have contributed to the full Our Tottenham submission.

Below are some points which relate to the 'soundness' test.

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

No. It does not meet the community's requirements. It is vague on how to meet many London Plan, national and local targets and policies – e.g. for necessary social infrastructure as detailed in the Our Tottenham submission. It also fails to demonstrate how the local heritage, and the character of Tottenham in particular will be protected. This Plan is singularly focused on enforcing a 'top-down' social and physical re-engineering of large parts of Tottenham to the detriment of current communities.

Most crucially the plan does not respect the overwhelming view of Tottenham's residents (as made clear in the Soundings run consultation) that their priorities were provision of Council and social housing at a genuinely affordable rent, and for enforcement against private sector rogue landlords. In addition, 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'. This aspiration, and the priorities clearly expressed by local people will not be achieved by this plan. It does the reverse by promoting private sector developments which will be not be affordable or accessible to the thousands of families on the housing waiting list.

To expand further on this, 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. 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?

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, so how can it be the most appropriate strategy when considered against the alternatives' if no alternative has been proposed or evidenced?

The Our Tottenham Submission discusses further housing aspects of the plan in great detail and I refer to that document to complement this 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 presented as the engine for social change, and flowing from that are plans for very high rise, high density buildings in Tottenham Hale (where I live). The social change which the plan proposes is the development of 'mixed communities', a phrase which demonstrates a lack of understanding of our current community, and which also reveals the plan aims at changing the social make-up of our community.

There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities' What does this mean? 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 has no detail on these critical points.

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 little evidence of broad based community participation encouraged or promoted by the LA 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 not very well 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. But in any event my reading of the plans, especially for Tottenham Hale, is that the bulk will be one and two bedroom flats. The policies and plans simply do not match.

There is a very serious lack of health provision, particularly Tottenham Hale. With a further 5000 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 to Strategic Policies, Pre-submission version January 2016) 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...’ The Tottenham Hale gyratory works are complete, yet the traffic is frequently as gridlocked as ever, and access routes, such as Ferry Lane are extremely congested. How will an additional 5000 homes, (possibly an additional 10,000 people) be accommodated?

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

No. 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 surely increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.

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.

This is a one-dimensional plan. It relies on private developers and a buoyant housing market to achieve its objectives. Yet there are already concerns that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. Surely the LA 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?

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.

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?***

No. 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, for climate change avoidance and mitigation, and so on). 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.

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