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**From:** Dave  
**Sent:** 27 March 2015 23:54  
**To:** LDF  
**Subject:** HFRA response to LBH Local Plan consultation, March 2015

**Haringey Federation of Residents Associations**

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27th March 2015

To: Haringey planning policies team - [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)  
From: Dave Morris - Secretary, Haringey Federation of Residents Associations

## **HFRA response to LBH Local Plan consultation, March 2015**

### **1. Introduction**

1.1 The Haringey Federation of Residents Associations (HFRA) is the umbrella organisation for the 180 Residents Associations throughout Haringey. We are an inclusive Federation, involving Residents Associations based in areas of public and social housing, as well as RAs based in areas of mixed tenure and ownership. Hence we cover all areas of the borough, and a wide range of key issues relevant to local communities generally.

We have been particularly heavily engaged with planning and development matters, including being the main community organisation present throughout the Haringey UDP Inquiry in 2005 and Haringey LDF EiP in 2011. We have also taken part in the London Plan EiP in 2010, including being invited by the inspector there to lead on social infrastructure debates.

### **2. Objection to the process**

We support the following call for the re-scheduling of the consultation, made by the Our Tottenham Planning Policy Working Group of the Our Tottenham network:

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

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

#### **Fair and lawful consultation**

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

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

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

### **Fundamental flaws in the current consultation**

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

1. A version of the latest draft Site Allocations document was submitted during the previous statutory consultation process in 2010 - this process culminated in the Examination In Public for the Haringey Local Plan. On 25th June 2010, the Haringey Federation of Residents Associations objected that the then consultation over proposed Sites was 'Not Compliant or Unsound' for the following reasons:
  - a. *We have reviewed the entire document and find that the information provided is so incomplete and inconsistent from site to site that coherent response is not possible.*
  - b. *As a minimum the site diagrams should be to a constant scale, indicate North points, all road and street names be clearly labelled, building numbers shown, and adjacent sites in the same ownership identified.*
  - c. *The Local Authority should also have adequately researched the ownerships and made clear that all building owners and residents of these sites have already been informed of the Local Authority's proposals with regard to them.*
  - d. *We would wish to comment on each site when a coherent document is available.*

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

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

The information is sometimes biased and/or appears to be deliberately misleading in hiding the intentions. For example, the information about Broad Water Farm (SA63) portrays what the Council must have known are highly controversial proposals as being '*Potential improvements of the housing estate to improve stock, design of the site and routes through the area.*' This may sound innocuous. Yet local community reps'

conversations with planning officers revealed the real agenda is to promote mass demolitions of homes, accompanied by house-building on the neighbouring park. Further, no information is provided on why the 3 Housing Association estates in the northern part of the 'zone' are included - but it transpires that the Council want to promote future Tall Buildings across these relatively recently-built low-level estates.

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

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

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

**6.** There has been conflicting information provided on when the consultation actually ends. Various official sources have the closing date as 23rd, 25th, and 27th March. In addition, the consultation is not valid because of the failure to individually inform affected business and affected residents by letter. We request a list of all the addresses in Tottenham formally notified in this way.

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

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

argue that this was and remains your responsibility given that these are your plans, your proposals about our neighbourhoods. You have the money, the officers and the resources to organise these meetings, yet they have not taken place.

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

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

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

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

**13.** According to p10 of the Tottenham AAP, para. 1.17: '*Initial consultation on the broad proposals for Tottenham was undertaken in January 2014. A number of public consultation events were also held that attracted over 80 residents and stakeholders. The full report is available on the Council's website [www.haringey.localplan/totthenaap](http://www.haringey.localplan/totthenaap) but in summary the comments received highlighted a number of common themes:*'

That link is invalid. Where is the report referred to? It does not seem to be here either:

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

### **Consultation rescheduling**

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

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

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

### **3. Overall policy objectives and outcomes**

3.1 Everyone now recognises that we must have environmentally and socially sustainable communities throughout Haringey, London and the UK. The current planning policies for local boroughs and London claim to agree - but is this only lip service?

3.2 We are facing extreme pressures from private and corporate developers and town planners leading to a range of concerns & problems, and pressure on an already inadequate social infrastructure (schools, health facilities, parks, play areas, public transport, local pubs and community centres and other facilities etc). Some policies supposedly meant to protect the interests of communities are being systematically flouted by developers, Councils & the GLA.

3.3 Faced with constant pressures for inappropriate or damaging development, residents want to ensure that we and future generations will live in strong and sustainable communities. To that end we have had to stand up for our interests. Throughout Haringey (and indeed London) there are an ever-growing number of objections and campaigns over proposed local developments. Residents groups and associations are forming more and more alliances to resist what's wrong with major developments as well as smaller but equally important sites in local neighbourhoods.

3.4 We agree with the Our Tottenham network's submission to this consultation. In particular we support their Charter calling for all plans, proposals, decision-making and developments to....

#### **A. IMPROVE 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
- All planning policies must ensure that Tottenham gets the best facilities to serve our communities eg protect and expand our local community-run community centres

#### **B. CONTRIBUTE TO DECENT AND AFFORDABLE HOUSING FOR ALL:**

- Ensure that new developments provide the secure, and genuinely-affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out of our borough
- All planning policies must ensure that there are adequate, genuinely affordable (for those on the lowest incomes) and long-term secure homes for all who need them, in contrast to current Council definitions and policies. At least 50% of all new homes should be genuinely affordable social rented housing. As a specific example, planning policies must support the residents of Love Lane Estate, and any other residents, threatened with possible relocation and demolition.

#### **C. 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

#### **D. 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

- All planning policies must: safeguard and value heritage buildings, including those outside Conservation Areas; 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. We also need to identify and improve quality of design, amenity and sustainability standards for all new development.

#### E. IMPROVE THE STREET ENVIRONMENT:

- Ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery  
- All planning policies must 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; 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; ensure High Streets are re-designed more for people and less for cars

#### F. SUPPORT AND EXPAND YOUTH SERVICES AND FACILITIES:

- Encourage and support local youth speaking out for the services, centres and facilities they need  
- All planning policies must: demand the best possible opportunities and funding due to young people (equal to the best practice elsewhere); support organisations who work with young people - in a way they are happy with - to deliver future services (using successful youth activities and projects as an example to emulate); 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

#### G. 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

#### H. 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.

#### I. EMPOWER OUR COMMUNITIES:

- Ensure real respect, engagement and empowerment for our communities and community groups so that they are driving the decision-making  
- All planning policies must protect and create new spaces and hubs where people can meet and organise themselves, share skills and expertise; ensure that the local community is driving the decision-making

#### H. SUPPORT LOCAL COMMUNITY PLANS:

- Support local communities' own ideas and visions for their local sites & neighbourhoods eg the community plans for Bull Lane and Wards Corner  
- All planning policies must promote and recognise community planning and community plans of all scales and at all levels – for sites, streets/estates, neighbourhood and Tottenham-wide.

3.5 The policies should be amended to reflect the above points and achieve the relevant objectives.

3.6 Most of the above points echo the HFRA's own submission during the drafting of the current Haringey Local Development Framework / Plan in 2011. It was, and still is, the HFRA's view that the key objectives and policies of the Local Plan documents (including the one subject of the current consultation) should...

- a. protect heritage and conservation features & the distinctive character of neighbourhoods
- b. resist unwanted over-development imposed on communities

- c. oppose over-intense housing development - densities have risen massively in the last few years, and there is a systemic failure by Councils and the GLA to enforce maximum density limits
  - d. support genuinely affordable housing – the vast majority of housing development is unaffordable to local people in need. A scandalously low % of new homes completed in Haringey and London were social housing (the only genuinely ‘affordable’ housing), despite housing need being used as ‘justification’ for otherwise unacceptable policies. [See below for more comments regarding housing issues]
  - e. protect valued ‘backlands’ sites
  - f. defend open green space from development, especially undesignated sites
  - g. address the widespread deficiencies of green open space of all kinds
  - h. defend and expand children’s play facilities in our neighbourhoods
  - i. oppose poor project design
  - j. defend community facilities eg. healthcare sites, local shops, post offices, meeting places, community pubs. Publicly-owned land is continuing to be widely sold off for private development.
  - k. campaign against the sell off of ever more publicly-owned land
  - l. halt the loss of affordable offices & sites for voluntary groups & small businesses
  - m. protect front gardens - concerns include the quality of street scene, pedestrian safety, flooding etc
  - n. resist environmentally unsustainable development – eg energy use, materials, design etc. A comprehensive low/zero-carbon energy programme (insulation, alternative energy generation, 100% recycling etc) is needed for every home, building and workplace throughout London
  - o. criticise increasing pollution - visual, air and noise
  - p. campaign against the ever more illegal advertising hoardings and billboards
  - q. remove street clutter
  - r. implement effective traffic calming, ‘living’ streets & affordable public transport
  - s. call for greater (not less) resources for maintenance and improvement of public facilities, buildings & services
- 3.7 The policies should be amended to reflect the above points and achieve the relevant objectives.

#### **4. Housing issues in particular**

4.1 As we stated in the 2011 consultation, and with ever greater force and resonance today, housing issues are purported to be central to planning policies. However, we believe the draft consultation document fails to get to grips with most of the key issues.

4.2 The following have been repeatedly identified as the key concerns in Haringey and around London, and the policies should be amended to reflect these.

4.2.1 Over-high housing densities – do they undermine the need to ensure sustainable communities? Current social and environmental infrastructure is inadequate to deal with the needs of current population levels, let alone greater/denser population levels. People are entitled to good quality living space and access to gardens etc. Do we really want to see a return to the failed tower blocks & estates of the past?

4.2.2 ‘Affordable’ and social housing: the failure to reach even the very modest % targets from new housing completions. Most so-called ‘affordable’ housing is well out of the reach of the vast majority of those who need it, and should be radically redefined. Social housing is currently the only genuinely affordable, permanent housing and should be the majority of new builds (it is only a tiny %).

An additional point regarding 'Balancing' of housing tenure, the terms used need to be clearly defined because in some recent developments such as Lawrence Road and Brook House they have been misleading:  
eg

- “Affordable” ?;
- “Private” ?;
- “Social rented” – does this mean “council and housing association rented homes for people on council waiting list”?
- “Affordable rent or sale” – does this mean “shared ownership – half buy/half rent”? If not what does it mean?

It is not “a high concentration of social rented housing” that leads to worklessness, poor educational attainment levels, crime and anti-social behaviour. Up until the 1980s Tottenham had high concentrations of council housing without these problems. The causes include the loss of jobs and increasing poverty due to deindustrialisation and national socio-economic policies. The tenor of this paragraph denigrates and discriminates against Council housing and those who live in it, and is arguably illegal under Equalities legislation (through indirect discrimination against people who are strongly represented among Council tenants eg those with disabilities and those from black and minority ethnic backgrounds).

4.2.3 Do S106 agreements lead to actual planning gains? Community facilities and amenities of all kinds essential to sustainable communities (eg open spaces, childrens’ play areas, health, education, sports, leisure and meeting places, local shopping parades etc) are not only failing to be extended to address existing deficiencies, let alone the ever greater population pressures, but are under threat and being eroded on a daily basis in local neighbourhoods and town centres alike. No amount of S106 contributions (or contributions from the future Community Infrastructure Levy fund) can mitigate such real effects on the ground.

4.2.4 What can be done about the failure to ensure that new build housing contains enough family-sized housing, especially family-sized genuinely affordable and social housing? In Haringey policies recommend adequate 3-bed, and 4-bed units but only a tiny % gets built each year.

4.2.5 How do we halt the spread of Houses In Multiple Occupation? Homes are being divided into ever smaller units, causing not only loss of much-needed family accommodation but also unacceptable over-crowding.

4.2.6 How do we ensure that all new housing, including all ‘affordable’ and social housing, is designed to conform to accepted, good quality standards – and to the positive character and heritage of neighbourhoods? This relates to the interior and exterior of every home, including impact on and contribution to the street scene.

4.2.7 How do we ensure that every substantial residential development contributes effectively to improving public open spaces and recreational facilities of all kinds? How do we protect smaller, informal green spaces?

4.2.8 How can we ensure that, in boroughs with serious land stress and competition, that all available land



is earmarked for community needs - rather than for what developers can grab in order to make the most profit? Existing amenity land (eg for health services, education, and community facilities and services of all kinds) is being whittled away and sold off.

4.2.9 What can be done to respond to ever-increasing house prices, rents and insecurity? And could there be more effective action to prevent homes being left empty for long periods?

4.2.10 Bearing in mind the need for urgent and drastic cuts in carbon emissions to avoid dangerous climate change, what comprehensive policies and practices need to be imposed on all housing development eg regarding energy usage and generation, materials, design, space, greenery and green space, recycling etc? Developers are rarely paying more than lip service to these critical issues. Policies need to be very carefully appraised and strengthened regarding environmental sustainability.

4.3 The threat of demolitions and 'redevelopment' of Council and social housing estates should be withdrawn. Refurbishment is always preferable than demolition. No structurally sound homes should be demolished and there must be no net loss of Council or social housing units. It is a landlord's duty to ensure repairs and maintenance are properly carried out.

We support the objection of the Haringey Defend Council Housing organisation, and as an example the points raised by the Broadwater Farm Residents Association.

4.4 The policies should be amended to reflect the above points and achieve the relevant objectives.

## 5. Summary

5.1 To summarise, it has been our experience that Haringey, London and UK planning policies, despite many good sentiments, are ineffective in protecting the interests of local communities and should be amended appropriately. Reasons include:

- The *policies* themselves
- The *interpretation* of the policies
- ***Failure to ensure, commit to, and enforce, key policies which are supposed to protect community interests*** (eg social infrastructure, open space, affordable housing targets, housing density limits, heritage etc) when contrasted with other policies (eg general house-building and large scale development)
- ***Enforcement of conditions and agreements***
- ***The lack of a level playing field*** between local residents & well-resourced developers
- ***The reliance on S106 payments (or a future Community Infrastructure Levy)***, instead of actual planning gains
- ***Objectors denied their right to appeal***, unlike developers
- ***The need to listen to, genuinely consult, and empower communities***

Dave Morris  
Secretary, Haringey Federation of Residents Associations

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