

**Haringey Council Local Plan Consultation  
DEVELOPMENT MANAGEMENT POLICIES – PREFERRED OPTIONS**

**RESPONSE BY THE *OUR TOTTENHAM* NETWORK  
PLANNING POLICY & LOCAL ECONOMY WORKING GROUPS  
27<sup>th</sup> March 2015**

**Contact:**

Organisation: <http://ourtottenham.org.uk/>

Coordinators for the Planning Policy Working Group:

- Claire Colomb
- Dave Morris –

**Content:**

**1. INTRODUCTION**

**2. OVERALL CONCERNS ABOUT THE CONSULTATION PROCESS**

**3. COMMENTS ABOUT THE DEVELOPMENT MANAGEMENT POLICIES – PREFERRED OPTIONS CONSULTATION**

[Comments on Chapter 3 and Chapter 5 only]

**4. GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE DEVELOPMENT MANAGEMENT POLICIES WHERE RELEVANT**

**5. SUPPORTING EVIDENCE & APPENDICES**

Appendix A1: Our Tottenham Community Charter

## 1. INTRODUCTION

Tottenham is a great place with a rich social and architectural history, made up of vibrant, diverse and talented communities. We want to ensure this continues. The **Our Tottenham network** brings together 50key 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.

The **Our Tottenham Planning Policy Working Group** is active on behalf of the **Our Tottenham network**. **Organisations** affiliated to the network include (as of 23.3.2015): 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, Dowsett estate Residents Association, 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, Taxpayers Against Poverty, 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.

This response, formulated by the **Our Tottenham Planning Policy Working Group and 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.

## 2. OVERALL CONCERNS ABOUT THE CONSULTATION PROCESS

Before entering into substantive considerations in the subsequent sections of this response, we would like to express grave concerns about the consultation process on the 4 Local Plan documents which took place in February-March 2014:

- **Alterations to the Strategic Policies (DPD)**
- **Draft Development Management Policies (DPD): Preferred Option**
- **Draft Site Allocations (DPD): Preferred Option**
- **Draft Tottenham Area Action Plan: Preferred Option**

We wrote a formal letter of complaint about various flaws in the process to Cllr Ali Demirci, Mr Stephen Kelly and the LDF team - LBH Planning on 25<sup>th</sup> March 2015, after extensive discussion with various community group representatives. We called for the consultation to be halted and re-scheduled on the grounds explained in the letter below.

As we approach the end date for the consultation period on Haringey Council's planning policies and related documents 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.

### **Call for a 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.gov.uk/housing-and-planning/planning-policy/local-plan](http://www.haringey.gov.uk/housing-and-planning/planning-policy/local-plan) 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-policy/local-plan>

[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 flaws 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.

**A.** 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.

**B.** In the alternative we call for an additional 6 weeks starting from 28th March in which the above activities can be organised.

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

We await your acknowledgement of the complaint and how the council will respond to the concerns and flaws in the consultation process.

Yours sincerely,

Dave Morris- for the Our Tottenham Planning Policy Working Group

### **3. COMMENTS ABOUT THE DEVELOPMENT MANAGEMENT POLICIES – PREFERRED OPTIONS CONSULTATION**

**Due to the short window for public consultation on the 4 documents amending the Haringey Local Plan, we have only managed to comment on the Development Management Policies Chapter 3: Housing and Chapter 5: Employment and the Economy.**

#### **Chapter 3: Housing**

The concerns raised here have to be read in conjunction with the comments on employment land and sites made in Section 3.1 and 3.2 of our overall response to the Alterations to Strategic Policies document.

**3.2:** return to 50% affordable housing target. It should be increased to the maximum possible.

**3.4D:** reword to guarantee NO NET LOSS of social housing units and no displacement of existing tenants as part of any plan for an estate. The word ‘affordable’ is misleading, as it cannot be equated with ‘social’. Social housing units which may be demolished should only be replaced with social housing units, like-for-like, and not by other forms of ‘affordable’ housing which are not social renting.

**3.5+3.6 on housing estate renewal:** See detailed comments made in the original document of the Alterations to Strategic Policies: we strongly disagree with the approach embedded in the wording of Alt53 and Alt64 about Housing Estate Regeneration and Renewal. Also see 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. The following principles need to be CLEARLY embedded in the sections and policies on housing estate renewal:

- 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 no demolition of structurally sound homes, absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for an estate. There should be.

#### **Policy DM19 Affordable Housing:**

- 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.
- we question the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). 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. 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. An 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’ is not 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; and 70% of that affordable housing target should be social rented housing.

**Chapter 5: Employment and the Economy** (contributions from the **Our Tottenham Local Economy Working Group**). The concerns raised here have to be read in conjunction with the comments on employment land and sites made in Section 3.3 of our overall response to the Alterations to Strategic Policies document.

- Chapter 5 provides no sense of vision for the Haringey economy and its different places and aspects and strengths.
- Paragraph 5.3 seems to accept that employment land will be sacrificed for the Council's housing and regeneration ambitions. This is unacceptable and unsound in planning terms, as well as in direct contradiction with many of the Council's and the GLA's own planning policies.
- **Policy DM49** (and supporting paras) seeks to achieve the maximum amount of employment floorspace and employment densities through new development. This will inevitably lead to the delivery of office type workspace, rather than hybrid or industrial type workspace. This is a concern given the existing supply of and strong demand for industrial type workspaces, which should be protected. We propose this policy is amended so as to provide a more sensitive approach.
- We disagree with the suggestion in **para 5.10** that 'old stock' is not suitable to 'current need'. New activities often take place in older stock, because it provides suitable spaces and typologies for the work and is more affordable. Also, what is the meaning of 'regenerate employment land'?
- This document should include policies relating to uses suitable for Haringey's industrial land, rather than making a loose and unspecific reference to the London Plan (**para 5.12**), which will be difficult to find.
- **Policy DM50** and supporting text– for reasons already set out, we disagree with the blanket facilitation of mixed use development on employment sites. The guidance recommended by the Employment Land Study on how to provide B-class uses within mixed use schemes has not been provided and should be.
- **Para 5.18** gives far too strong a role to viability assessments, which developers will easily 'game' in order to facilitate mixed use development on perfectly viable and well used employment sites. All planning is subject to viability so there is no need to spell this out. If the intention is to restrict mixed use development schemes, this should be done through policy.
- **Para 5.19** sets out the Council's expectation that mixed use schemes will deliver 'provision of affordable workspace in perpetuity'. This should be referred to in policy rather than being hidden in supporting text. 'Affordable workspace' should be defined.
- **Para 5.20** refers to the importance that mixed use proposals 'will not prejudice the continuation of industrial and business activities'. This should be referred to in policy DM50. Again, guidance needs to be provided on how to deliver industrial uses within mixed use develop and how to conduct mixed use development within industrial areas without damaging them. This is untested.



- **Policy DM51 on warehouse living** should be reconsidered in order to consider the risk that the policy destroys rather than protects the live-work uses in the area by facilitating new development which displaces existing residents and workers. The policy should be developed in collaboration with those who live and work in the relevant areas to ensure this is not the case.
- **Policy DM52 is not sound.** There is strong demand for employment space in London, and the evidence base for Haringey suggests strong demand for its own supply, as discussed above. Employment sites which are experiencing problems should be supported and improved rather than given over to housing uses. We are concerned that owners and investors may use the bullet points under point A to justify the redevelopment of employment land for other uses even where it is perfectly well used and occupied e.g. by not renewing leases; only offering short leases; not investing in their buildings; not advertising spaces effectively etc. Much clearer statements should be included that this policy will not apply to existing, occupied, in use sites.
- **Para 5.26** suggests a misunderstanding of the NPPF. The issue is not that employment land cannot be protected where there is no prospect of *development* coming forward, but that it cannot be protected where there is no prospect of it being *in use*. Again, this suggests a dominance of developers perspectives rather than users perspectives in thinking about the employment land policies.
- **Policy DM53** re: town centres does not detail the Council's approach to permitted development in terms of conversion of office to housing – how will this be managed to ensure it does not undermine high streets and town centres? The protections to limit conversion of retail to housing do not go far enough.
- **Policy DM57 re: access to jobs and training** is inadequate. No targets are provided nor any consideration of what kinds of jobs and training Haringey needs. No evidence base is referred to or cross references to other strategic documents.

#### 4. GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES IN TOTTENHAM ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE DEVELOPMENT MANAGEMENT POLICIES WHERE RELEVANT

These principles were spelled out in Our Tottenham Response to the previous draft Site Allocation DPD produced in March 2014 (which including sites in Tottenham, now mostly in the Feb. 2015 Tottenham AAP consultation draft). They are based on the *Our Tottenham* Community Charter and represent a consensus about how new developments should protect existing residents and businesses and enhances their quality of life and opportunities. **THESE PRINCIPLES SHOULD BE APPLIED TO THE DEVELOPMENT MANAGEMENT POLICIES WHERE RELEVANT.**

##### Under Site Requirements, proposals for each site should:

1. Relate to sites that are mostly vacant or derelict. Any site consisting of mostly viable buildings and usage should not be subject to a Site Allocation or earmarked for demolition or change of use, except in very exceptional circumstances (such as those buildings and activities not contributing to any of the agreed goals for Tottenham and Haringey, or being predominantly vacant or derelict). No housing that is structurally sound should be demolished. It should be recognised that a Site Allocation for development is likely to create huge uncertainty, stress and blight for the current occupants of the site – this is unnecessary and unacceptable except in the most exceptional circumstances. Local Plan policies already allow for refurbishment and renewal of existing buildings, improvements to social infrastructure and the streetscape etc.
2. Conform to Lifetime Neighbourhoods criteria (as set out in the London Plan)
3. In Tottenham, conform to the Community Charter for Tottenham
4. Conform to best practice for similar sites around the UK and Europe
5. All new housing on the site should be high quality and genuinely affordable:
  - An affordable home is one that is affordable to any tenant earning the London Living Wage. 70% of such housing should be social housing.
  - A quality home means all of the following: Secure; Physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards ie Parker Morris standards plus 10% more space - and access to adequate outside garden space); It should comply with, and not exceed, the density matrix as set out in the London Plan, and built to 100% lifetimes homes standards. Designs should promote a permeable and convivial street pattern; protect and enhance the conservation and positive character of the local area. There should be easy access to schools, work, healthcare, cultural facilities, public transport, fresh affordable food, and green space. It should allow people to have control over their indoor and outdoor space, and to develop communities and support each other. Residents and communities should be empowered to make decisions and have control over their housing.
  - As stated in the Haringey Local Plan, Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough, and 3-4 storey development in its town centres. The pattern of local housing heights in the various neighbourhoods should be respected and all new housing sites should conform to such patterns. In some very exceptional

circumstances where the overwhelming pattern of development in an area is greater, heights may be appropriate up to a maximum of 6 storeys as long as there is no overshadowing or blocking of light to nearby residences, or key sightlines.

6. Refurbishment and renewal is preferred to demolition and re-build, unless this is impossible
7. Development to include additional social infrastructure, including adequate levels of quality, public open space (including major new spaces to address areas of deficiency as set out in the London Plan), play areas/equipment, and a range of other social infrastructure and amenity infrastructure, to serve the residents in and near the site. No net loss of social infrastructure.
8. No net loss of employment land and facilities unless the existing site can be demonstrated to have been unviable for a clear 3 year period.
9. All new facilities (residential, commercial, social) to be environmentally sustainable, ie conform to highest carbon-neutral criteria
10. Preserve the heritage and positive characteristics of the surrounding area and of Tottenham as a whole. Any buildings of merit should be added to the official Haringey Locally Listed Buildings list
11. For each development, all interfaces with streets, public areas or back gardens should enhance the view and contribute positively to local community experience of the site.
12. Change of use of a site will only be allowed in exceptional circumstances (such as the current usage proven to be unviable), subject to the criteria set out here being fully adopted.
13. A Social and Community Impact Assessment outlining how it conforms to the above principles is to be produced for each proposed development.

**Under Development Guidelines, proposals for each site should:**

- a. For Site Allocations, s106 and CIL to be paid towards community benefit to be calculated as all the development profit/surplus expected less 7% for the developer (which we understand is the approx.. European average profit margin). The current CIL to be recalibrated at much higher rate to reflect this figure. At least 20% of the total to be paid shall go to local green space improvements, and at least 20% shall go to youth services and facilities in the area.
- b. Anyone displaced by the development (whether residential or commercial tenant) must be rehoused by the developer in an equivalent or improved arrangement in the final site or nearby
- c. Any prospective developer must demonstrate an active and genuine local community partner involved in the decision-making around the design and management of the future site.
- d. If there is an expression of interest for a Community Plan for the site a minimum period of 12 months shall be set aside to enable such a Plan to be developed before any further action is taken
- e. All jobs created during and following the development to be quality jobs, above the London Living Wage, with local trade union branch involvement, and earmarked for local people as far as possible, and to include local apprenticeships

## 5. SUPPORTING EVIDENCE & APPENDICES

- **A1: Our Tottenham Community Charter**

# OUR TOTTENHAM A COMMUNITY CHARTER

Planning & Regeneration by and for the Community

*Adopted at the Our Tottenham conference, April 6<sup>th</sup> 2013. Amended at the conference, Oct 11<sup>th</sup> 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 6<sup>th</sup> 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 11<sup>th</sup> 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, Eriba 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