

**Haringey Council Local Plan Consultation  
SITE ALLOCATION DPD – PREFERRED OPTION CONSULTATION DOCUMENT**

**RESPONSE BY THE *OUR TOTTENHAM* NETWORK  
PLANNING POLICY WORKING GROUP  
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. OVERALL COMMENTS ABOUT THE SITE ALLOCATION DPD – PREFERRED OPTION CONSULTATION DOCUMENT**

**4. GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES OF THE SITE ALLOCATION DPD**

**5. DETAILED COMMENTS MADE IN THE ORIGINAL TEXT OF THE SITE ALLOCATION DPD – PREFERRED OPTION CONSULTATION DOCUMENT**

See attached document, in which we made detailed comments in relation to particular points and specific sites, with the input of some of our affiliate members.

**6. SUPPORTING EVIDENCE & APPENDICES**

- **A1 Our Tottenham Community Charter**
- **A2 Response by Broadwater Farm Residents Association on the proposal SA63 [supported by *Our Tottenham*]**

## 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 50 key local community groups, projects and campaigns standing up for the interests of people in Tottenham, especially around planning and regeneration issues (see <http://ourtottenham.org.uk/>). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham.

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**, 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/>) and updated in October 2014 following our third Community Conference. All the materials produced by the **Our Tottenham network are available on our website**.

This response builds upon the response we submitted in March 2014 responding to the draft Site Allocation DPD Regulation 18 Consultation Document which was subject to consultation a year ago.

## 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-2014-2016](http://www.haringey.gov.uk/housing-and-planning/planning-policy/local-plan-2014-2016) 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-2014-2016>

[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. OVERALL COMMENTS ABOUT THE SITE ALLOCATION DPD – PREFERRED OPTION CONSULTATION DOCUMENT

The SA DPD introduces the key development sites which will accommodate the majority of development in the Borough by 2026. As recognized on p. 8, ‘the Further Alterations to the London Plan (FALP) have set a challenging housing target for Haringey. The target between 2011-2015 was 820 net units per annum. From 2015, it will be 1,502 new units per annum. Thus, over the Plan period 2011-2026, the housing target for the borough is 19,802 net additional dwellings.’ The SA DPD then states (p. 8) that ‘The sites identified in the Tottenham AAP have the potential to accommodate approximately 10,000 of these dwellings over the Plan period’. **The proposal to concentrate half of the housing delivery target (=10,000 homes) imposed on Haringey by the latest Alterations of the London Plan in Tottenham is not realistic and potentially highly damaging to the existing residents and businesses** (see our Reponse to the Alterations to Strategic Policies 2011-2026 and to the Tottenham AAP). We disagree with the fact that Tottenham should host half of this targeted growth. **The target of 10,000 new homes in Tottenham is totally over-estimated.**

Several wards of Tottenham already have the highest densities in the Borough (see table and map in the overall response to this APP). Bruce Grove, Saint Ann’s Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land – which means that the population density in the residential areas of those North Tottenham wards is high, too. Tottenham has the highest level of social deprivation and suffers from a chronic shortage of key facilities such as GPs, open space, schools etc... Tottenham cannot cater for 10,000 extra residents without grave problems for its social infrastructure and existing population. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. This is an unrealistic expansion in housing, in advance of providing for the other essential needs of the existing as well as the future population of the borough.

More generally – for the Borough as a whole, on p. 9 of the SA DPD it is stated that a **review of the Council’s Infrastructure Delivery Plan** is underway to understand the levels of new infrastructure required in order to accommodate an increased population in Haringey. **This review should have been ready before the publication of the Preferred Option SA DPD and Tottenham AAP.** It is crucial to have **a clear picture of the exact social and public infrastructure needs to accommodate an increased population in Haringey, in addition to the backlog and existing shortages.** Without this, it is **impossible to make sound site allocation policies and guidelines,** which by definition need to allocate sites for key social infrastructure. As a result, in the present version of the SA DPD, how and where social infrastructure will be provided to accompany the planned 20,000 new homes is absolutely not demonstrated. A precise list of the needed social infrastructure, with supporting evidence, to cater for (i) the backlog of need and (ii) anticipated growth is needed in the next draft SA DPD, with precise proposals for location on particular sites. How these amenities and services would be provided and funded – in particular through Section 106 agreements and the CIL – is not explored convincingly. We also demand that any new development encouraged on sites earmarked in the SA DPD should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents of the Borough. There should be a strict policy of protection of existing community centres - some of which are under threat or seeking new or longer leases, of pubs, post offices, and corner shops from change of use. An expansion of youth services and facilities and nurseries is absolutely vital across Tottenham.

The aim of attracting new investments, new residents, new businesses and new development to Haringey which underpins the SA DPD **should not be done at the expense of the existing community, i.e. by displacing local residents and local businesses; and it should actually improve the lives of existing residents** (by creating jobs which locals can access and developments which generate true and significant benefits or facilities accessible to the community). In that context, we strongly challenge and question **the approach to housing provision and to 'housing estate renewal' which permeates the Alterations to Strategic Policies, the Tottenham AAP, and a number of sites in the proposed SA DPD**, in particular the following Council Housing estates: SA57 (Park View and Durnsford Road), SA63 (Broadwater Farm), SA66 (Leabank and Lemsford Close).

**We explained at length our objection to the redlining of these housing estates for redevelopment and to the type of 'estate renewal' proposed in our response to the Tottenham AAP and Alterations to Strategic Policies.**

**For the sites SA57 (Park View and Durnsford Road), SA63 (Broadwater Farm), SA66 (Leabank and Lemsford Close), this means that we demand the inclusion of the following principles in the SA DPD:**

- 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 housing
- There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for the area.



#### **4. GUIDING PRINCIPLES FOR DEVELOPMENT OF SITES ADVOCATED BY THE OUR TOTTENHAM NETWORK - TO BE APPLIED TO THE SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES OF THE SITE ALLOCATION DPD**

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 SITE REQUIREMENTS AND DEVELOPMENT GUIDELINES for all the sites in the revised Tottenham AAP and all the sites East of the rail line in the Site Allocation DPD.**

##### **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

#### **4. DETAILED COMMENTS MADE IN THE ORIGINAL TEXT OF THE SITE ALLOCATION DPD PREFERRED OPTION CONSULTATION DOCUMENT**

See attached SA DPD document, in which we made detailed comments in relation to particular points and to specific sites, with the input of some of our affiliate members. Due to the very short time period for public consultation and the flaws in the process (outlined in Section 2 above), we have only been able to review and comment about a small proportion of the sites located East of the rail line. The site allocation proposals which we have been able to review are highlighted in YELLOW in the table of content of the SA DPD. They have been assessed against the principles derived from the Our Tottenham Charter as outlined above.

#### **5. SUPPORTING EVIDENCE & APPENDICES**

- **A1 Our Tottenham Community Charter**
- **A2 Response by Broadwater Farm Residents Association on the proposal SA63 [supported by *Our Tottenham*]**

# 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

# **Haringey Council's Local Plan Consultation: Response by Broadwater Farm Residents' Association**

**24/03/2015**

## **Introduction**

We write our reply to Haringey Council's Local Plan Consultation mainly in reference to the *Sites Allocation Development Plan Document* dated February 2015. Haringey Council's Site Allocation 63 is the Broadwater Farm Area. This area includes Broadwater Farm estate with all its marvellous community facilities, and also Somerset Close, Lido Square, Moira Close and the houses along Lordship Lane to the north. Haringey Council's Planning Department has informed us that one part of the proposal is designed to facilitate housing to be built on a large area of the north end of Lordship Recreation Ground, including the enclosed sports field, to re-house some of those displaced by any future demolitions on Broadwater Farm.



The proposed zone is indicated by a red line on a map (see right) taken from the above document. This proposal, if adopted, would mean that developers could draw up plans to demolish housing on the site and provide new housing, whether this housing was provided by a Housing Association or was fully private sector housing.

The residents and the Residents' Association have worked with the Council to dramatically improve the estate over the last 30 years. It now has great facilities, including concierges, play areas, a health centre, landscaping and schools. In the last 6 years a range of refurbishments and repairs have been made - yet bizarrely it has now been put on a list of Council estates facing 'redevelopment'. We say it is the Council's duty as the landlord to finish off all the works started.

Any proposal for demolition would cause massive stress to all concerned, displacement and disruption for years, and undermine all the successful efforts over decades to build a strong and stable local community and to improve local facilities.

## Broadwater Farm

Broadwater Farm Estate was commenced in 1967 on the site of the allotments by Lordship Recreation Ground. It was a massive development of high density Council housing of initially 1063 flats for housing 3000-4000 people. Due to some early problems with the estate, such as leaking roofs, residents banded together and convinced the Council to carry out works on the buildings. By 1981 a process of refurbishment had started, but progress was slow. Residents created a very active Youth Association and a Residents' Association.

From the mid-1980s the Council consulted the residents about a new program of needed works and residents identified the improvements they wanted with the Council agreeing to implement them and finding the funds to do so. The community-led regeneration of the estate attracted over £40m of resources and has been a huge success. All of the tenants' recommended solutions were carried out by the Council. Improvements included concierges for all blocks, play areas, landscaping, workshops for rent, a health centre, a community centre, a new school campus, bus route through the estate, and more.

It is now one of the most well-served Council housing estates in the UK and regularly attracts visitors from around the world who wish to see this great example of successful community-led regeneration.

## Broadwater Farm Residents' Association

The current Broadwater Farm Residents' Association was established in 1987, originating from the Broadwater Farm Youth Association. It was established to look at the issues of lack of representation and deprivation on the estate as well as to raise community spirit. It has held regular meetings with councillors and council officials over the years to achieve these goals.

The current committee was elected at an Annual General Meeting in July 2014. We hold committee meetings on a monthly basis. We continue to organise events for local residents. In 2014, for example, there was an Open Day regarding repairs, an Estate Day with various fun activities for children and other residents and a children's Christmas Party. We organised these events in partnership with Homes for Haringey and other organisations such as the Church on the Farm.

## SA63: Proposal to 'Improve Stock'

Broadwater Farm Residents' Association certainly wants improvement of the existing housing on Broadwater Farm. We believe the principal way of securing this improvement is through Decent Homes work. This should include new front doors, kitchens and bathrooms for the existing blocks. (Tangmere in addition requires new roofs, windows and other works to the exterior of the block). It should also include work to ensure good insulation and other work to the existing blocks as necessary. We also believe that our blocks require redecoration: painting of communal areas and new, more attractive flooring.

We are very concerned that the proposal in SA63 to 'Improve Stock' in fact bears no relation to these aspirations but could actually facilitate wholesale demolition and rebuilding. We find evidence of this in the proposed *Alterations to Haringey's Adopted Strategic Policies 2011-2026*. Alteration 53 sets out an initial list of housing estates to be 'regenerated'. Broadwater Farm is one of the estates set out here. The reason box for Alteration 53 states that the alteration:

'Recognises the Council's commitment to improving its existing housing stock and the limitations of the Decent Homes Programme for a significant number of Council-owned homes.'<sup>1</sup>

This implies that estates, such as Broadwater Farm, which are on this specific 'regeneration' list will not receive further decent homes work but will face a different sort of future. The type of 'regeneration' Broadwater Farm may well face seems to be set out under Alteration 64 of the same report that states under the heading 'Haringey's Housing Estate Regeneration':

'...re-provision of low quality existing council housing with an equal quantum (on a habitable rooms basis) of higher quality modern social housing is not a financially viable option. The building of higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people is likely to be the only realistic options [sic], and even then, will require significant public subsidy may require flexible application of normal planning policy expectations for affordable housing provision.'<sup>2</sup>

The clear implication here is that estates on the regeneration list may well be knocked down and replaced with high density mixed tenure developments with a relatively low percentage of social, rented housing.

The possibility of the demolition of council housing on the Broadwater Farm site has been broached in meetings between members of the Broadwater Farm Residents Association Committee and Steve Kelly of the Planning Department on 18/02/2015 and 16/03/2015 and by members of our Association and Matthew Pattison of the Planning Department on 09/03/2015 at the West Green and Bruce Grove Area Forum. At both meetings Mr Kelly rather reluctantly agreed that demolition and rebuilding of blocks in addition to Tangmere (see below for issues

---

<sup>1</sup> *Alterations to Haringey's Adopted Strategic Policies 2011-2026*, dated February 2015, page 22.

<sup>2</sup> *ibid.*, page 27.

related to Tangmere) could be a possibility on the site but stressed that his department was not responsible for this decision and that no concrete plan for this had yet been drawn up. Mr Kelly stated in both meetings that the allocation of land on Lordship Recreation Ground was necessary for building new homes for decanted residents from Tangmere. Mr Pattison went further at the Area Forum on 09/03/2015 and said the land might be needed if blocks at Broadwater Farm need to be decanted, i.e. the land would house residents from more than one demolished block. It is obvious that the inclusion of Broadwater Farm on the Site Allocations plan does make demolitions of council blocks on Broadwater Farm a possibility and not only Tangmere, in the absence of any statement in the plan to the contrary.

**Broadwater Farm Residents' Association does not agree that the potential demolition of the blocks we live in should be described as a way to 'improve stock'. No report exists that indicates that the buildings on the Broadwater Farm are in any way structurally unsound. Stock should be improved by the type of Decent Homes work detailed above. In addition all the facilities and features serving and enhancing the estate should be treasured and protected. Further reasons for our opposition to demolitions will be detailed below.**

## **Haringey Council's Unwillingness to Re-provide Genuinely Affordable Housing on Regeneration Estates**

As the quote from Alteration 64 above indicates Haringey Council has no intention to re-provide an equal quantity of social housing when it demolishes social housing as part of estate regenerations. SA63 does indicate that there should be no loss of 'affordable housing floor space' in the development of Broadwater Farm. 'Affordable housing', however, is a broad term and is not the same thing as social housing with a permanent tenancy, that is let at a social housing rent similar to those currently charged for council housing. Alteration 64 indicates that most, if not all, of the new affordable housing that would be built on the Broadwater Farm site would be either shared ownership or 'affordable' rented housing that can be let at up to 80% of market rent. If we look at Appendix C of the Consultation on Haringey's Draft Housing Strategy 2015-2020, neither option is likely to be affordable for Broadwater Farm residents. Let us take rents set at 65% of the average private sector rent for Haringey (65% is the blended average of rents for Affordable Homes in London and Haringey). We see that this figure is £812.50 per month<sup>3</sup>. Appendix C to the report finds this just about affordable for a household on the median Haringey household income of £33,140 a year. The same report, however, indicates that the median household income for West Green ward is barely over £20,000 a year.<sup>4</sup> This would indicate that 'affordable' housing built on the Broadwater Farm site is likely to be unaffordable for local residents. The report is quite clear that shared ownership homes will not

---

<sup>3</sup> See *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C*

[http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/\\$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00006978/AI00041306/$Cabinet170315AppxCHaringeyHousingStrategyEqIAFINAL.doc.pdf) page 53-4.

<sup>4</sup>Ibid., page 58.

be affordable to the majority of Broadwater Farm residents. It indicates that new shared ownership homes in Tottenham require a minimum household income of £34,709 a year<sup>5</sup>.

Given reductions in government grants for new social housing build, it is very unlikely that Haringey Council could demolish an estate the size of Broadwater Farm and re-provision anything but a small proportion of the homes at social rent. So-called 'Affordable Rented' housing and Shared Ownership are outside the income ranges of most Broadwater Farm residents and most Tottenham residents.

Paragraph 3.2.2 of *Haringey's Local Plan: Strategic Policies 2013-2026* states that:

'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community they want to live.'

For the above reasons, we believe that the demolition of the Broadwater Farm and other council estates in Tottenham contravenes the Council's own policies.

**We therefore state that the only way to maintain the current supply of truly affordable housing in Tottenham and on the Broadwater Farm site is not to carry out demolitions of council homes.**

## **The Negative Equalities Impact of Demolitions on Broadwater Farm**

In reference to the above section the following should be noted from the Equalities Impact report:

'Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period.

Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east.

Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the general population of Haringey...

The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.'<sup>6</sup>

---

<sup>5</sup>Ibid., note 5, page 53.

<sup>6</sup>Ibid., page 12



We would also note council plans to house more homeless families outside London (see Haringey Council's *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18*)<sup>7</sup>. (This was a report made to the Cabinet as part of agenda papers on 16/12/2014.). Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing numbers of Haringey's homeless families being forced out of London. This pressure to move out of London, adds to the discriminatory nature of any proposal to demolish social housing. As Appendix C of the *Consultation on Haringey' Draft Housing Strategy 2015-2020* states:

'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.'

<sup>8</sup>

Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory nature of the Council's plan for Broadwater Farm and Tottenham as a whole.

We are also concerned that the letters regarding this consultation have only gone out in English and that a member of the Residents' Association committee was informed on 16/03/2015 by Haringey Council's Planning Department that consultation responses in Turkish would not be considered. We believe this contravenes that duty of Haringey Council to consult all sections of the community equally about the Local Plan.

**We believe that the Local Plan policy will discriminate against black households and the consultation on it was carried out in a way that excluded Turkish speakers. We believe that both of these factors breach the commitment in Haringey Council's Equal Opportunities Policy of April 2012 to the fair provision of services.**

**In addition the official summary in the DPD of what the S63 zone proposal would mean is inaccurate, vague, misleading and meaningless. This renders any meaningful 'consultation' impossible, or more likely biased in favour of the Council's unilateral agenda for the area.**

**We are concerned that a 'regeneration' of the Broadwater Farm that leads to the building of a large amount of Shared Ownership properties would disadvantage the black**

---

<sup>7</sup> *Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18* at [http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/\\$\\$ADocPackPublic.pdf](http://www.minutes.haringey.gov.uk/Published/C00000118/M00007188/$$ADocPackPublic.pdf) page 205

<sup>8</sup> *Consultation on Haringey's Draft Housing Strategy 2015-2020, Appendix C, page 5.*

**community and contravene Haringey Council's commitment to equal opportunities as indicated by their own Equalities Assessment. We also believe that providing homes at 65% market rent would have a similar impact due to lower median incomes in the East of the borough as indicated on page 58 of the Equalities Assessment document.**

## **Where will Secure Housing Tenants be Re-housed?**

Thousands of council homes are potentially at risk of demolition in Haringey. Alteration 53 to the Strategic Policies lists Northumberland Park, Love Lane, Turner Avenue and other smaller sites on the list for estate regeneration. There is a proposal to build 2,000 extra homes on the Northumberland Park Site Allocation area, according to a recent council newsletter <sup>9</sup>. Given the location and size of the 'regeneration area' this will clearly involve the demolition of many council homes in Northumberland Park. Residents across Haringey are being consulted about regeneration and therefore potential demolition at many other sites such as Tamar Way, Reynardson Court, Leabank View/Lemsford Close and some blocks on Imperial Wharf.

**We are concerned that with such a reduction in the supply of council housing, decanted residents from Broadwater Farm may end up with a very limited choice, if any, of where to move to.**

## **Leaseholders and Their Tenants**

Flats on Broadwater Farm tend to sell for a fairly low value of between £100,000 to £150,000 depending on size, as a quick survey of the Rightmove website indicates. Property values in the rest of Haringey and indeed London are much higher. Many leaseholders on Broadwater Farm will face having to move out of London entirely if their homes are demolished, even if they receive the current market value for their home.

In addition, it must be noted that the private tenants of leaseholders may end up homeless if their homes are demolished and they do not fall into one of the Council's 'priority need' categories, such as having dependent children or having a disability.

## **The Issue of Tangmere in Relation to the Potential Demolition of Other Council Blocks on the Broadwater Farm Estate**

Tangmere has a different design to the other blocks. Tangmere residents are currently being consulted in a Homes for Haringey Steering Group where demolition has been openly discussed. The principal reasons given for the concerns about Tangmere's future appear to be a fairly large number of leaks in the block and anti-social behaviour. At the last Steering Group meeting on 18/02/2015 the Repairs Department attended and stated they were doing extensive

---

<sup>9</sup>[http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland\\_park\\_newsletter\\_january\\_-\\_lores.pdf](http://www.haringey.gov.uk/sites/haringeygovuk/files/northumberland_park_newsletter_january_-_lores.pdf)

work on unblocking pipes, as pressure from water in blocked pipes on joints was deemed to be a major cause of leaks. It was also agreed to restore lighting to unlit parts of the car park due to resident complaints about car break-ins. The restoration of lighting has now been mainly done. Given we have been given no evidence of any actual structural problem at Tangmere, it must be suggested that the problems at Tangmere could probably be addressed through better management and maintenance and it does not seem likely that demolition is necessary. The meetings of the Steering Group have already brought about improvements in the block and it is rather 'lazy thinking' for Haringey Council to suggest when there are maintenance or anti-social behaviour problems in a block that demolition must be put on the agenda rather than helping residents explore other alternatives.

One point we wish to make, however, is that any problems in Tangmere that might exist should not be used as a 'Trojan Horse' for facilitating demolitions of any other blocks on Broadwater Farm. The current site allocation would enable developers to come forward with plans for demolitions of all blocks on Broadwater Farm, not just Tangmere.

**If it really is the case, that only Tangmere is being considered for demolition, which seems unlikely for reasons laid out above, then it must be asked why the Site Allocations plan does not indicate that all the other blocks will definitely not be demolished. This point does not in any way indicate that Broadwater Farm Residents' Association supports the demolition of Tangmere. We do not, and insist the necessary repairs be completed.**

## Conclusion

Broadwater Farm provides decent quality housing for thousands of people. It is a strong, vibrant community. Huge amounts have been spent on providing concierge suites, new roofs and windows, providing a Community Centre and many other facilities. All residents want to look to the future on our estate, rather than having our lives needlessly disrupted by demolitions and decants.

On 09/03/2015 at the Area Forum, Matthew Pattison of the Planning Department indicated that Haringey Council has no evidence of any structural problems with the blocks at Broadwater Farm. The Planning Department is also clear that any redevelopment of the Broadwater Farm would not lead to a net increase in the number of houses on the site and would therefore have no impact on the Mayor of London's target for 1,502 new homes a year for Haringey. These two facts must clearly beg the question, what is the point of demolition and rebuilding?

**One claimed point of the Broadwater Farm Site Allocation is the improvement of access to Broadwater Farm. We would accept this only if the Site Allocation plan is changed to clearly state that these plans would not involve home demolitions or loss of green space. Given the housing shortage in Haringey schemes like this should not be carried out at the expense of home demolition.**

**Similarly, we will only accept the inclusion of the Broadwater Farm on the Site Allocations list if it is stated clearly on the Site Allocation for Broadwater Farm that homes will be improved but none will be demolished.**

**Demolition of housing on Broadwater Farm would lead to a huge loss of socially rented, genuinely affordable housing. Current options for 'Affordable Rent' housing or Shared Ownership housing on the site would not be genuinely affordable for the majority of households in Tottenham. Demolition and rebuilding would contravene Haringey's commitment to equal opportunities.**

**Finally, we wish to state that we are horrified by the plans to build housing on Lordship Recreation Ground. This area is where young people from our estate play sports. It is a beautiful area that has had a large amount of money spent on it. Building on Lordship Recreation Ground would be an act of vandalism and we cannot believe that the Council could be seriously considering such a plan alongside the consideration of demolishing blocks on Broadwater Farm.**