

**Haringey Council Local Plan Consultation
Tottenham Area Action Plan (AAP) – Preferred Option Consultation**

**RESPONSE BY THE *OUR TOTTENHAM* NETWORK
PLANNING POLICY WORKING GROUP
27th March 2015**

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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

Appendix A1: Our Tottenham Community Charter

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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/>). 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**.

This response builds upon the response we submitted in March 2014 responding to the draft Tottenham APP 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 25th 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 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

Finally, the AAP 'Preferred Option' consultation document does not present the public with reasonable alternatives upon which to comment. The statutory examination of the Haringey Site Allocations DPD and the AAP for Tottenham must consider whether, in accordance with paragraph 182 of the NPPF, a proposal for a site is "justified" in the sense that this scheme is the "most appropriate when considered against the more reasonable alternatives, based on proportionate evidence". It is surprising that the Scoping Reports for both the Haringey Site Allocations DPD and the AAP for Tottenham provide no information as to "reasonable alternatives" to the present proposed scheme. The Issues and Options stage has not been pursued. This is a fundamental obstacle to a sound or just planning stage. The Issues and Options stage should have given to the existing community the opportunity to influence the terms in which the AAP is drafted rather than given a document prepared by others. The community has been asked NOT what their aspirations are for the area but RATHER to comment on the Council's aspirations. There is a fundamental difference. The role of the existing residents and business community is excluded from the AAP process and indeed they are often defined as a problem to be dealt with by decanting, dilution and removal. This significant social engineering and its impacts should be identified in the issues and challenges and specifically identified for assessment and appraisal as well as an issue for proper evaluation, debate, and wider discussion in considering appropriate options and issues before deciding the most appropriate policies for the plan in question.

3. OVERALL COMMENTS ABOUT THE TOTTENHAM AAP – PREFERRED OPTION CONSULTATION

The stated aim of the **Tottenham Area Action Plan**(AAP) is to facilitate and deliver the regeneration of Tottenham and ‘unlocking Tottenham’s potential as an increasingly attractive place to live, work, study and visit, a neighbourhood fully benefitting from London’s growth and its position in a world city’(The Vision, p. 23). Most local residents and businesses are already happy and proud to live, work and invite their friends to Tottenham. It is already ‘a place for diverse communities that people are proud to belong to’, to use the headline of the Sustainable Community Strategy 2007-2016 approved by the Council. Consequently, the aim of attracting new investments, new residents, new businesses and new development to Tottenham which underpins the AAP **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). Regeneration should not lead to gentrification in which local residents are forced or priced out of the area, and should not be done at the expense of the people of Tottenham. We do not want a form of regeneration which will over-develop Tottenham, which will push up house prices and private rents, reduce the amount of council housing in the area, have inadequate social infrastructure, force out small shops and businesses, encourage the exploitation of low-paid workers, and drive out large numbers of the poor and members of ethnic minorities to make way for a new higher-income 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 realised at the expense of the people already living and working here.

In Section 1 of the document, references to previous exercises in public consultation are made: consultation on an early ‘draft’ version of the AAP (March2014), ‘Tottenham Futures’, the Strategic Regeneration Framework and more recently, consultation on High Road West(September 2014)and Northumberland Park (October2014). Notwithstanding the fact that the truly participatory nature of these consultations were questioned by community groups, residents and businesses themselves (see comments in the AAP about that), there is little evidence in the AAP that comments, feedback, demands, objections made by many community groups have been taken into account. The outcomes of these consultations are summarised on pp 10-11 (para. 1.17 and 1.18), in which a list of points, issues and concerns are mentioned. This list actually represents rather well the views and fears expressed by many residents and businesses and the OT network:

1.17

- *The need for the AAP to be clear about what is being proposed, where, why, and the implications for local neighbourhoods, local residents and businesses;*
- *That the area is already densely populated and therefore there is concern whether the number of new residential development proposed for Tottenham is appropriate and equitable in a borough-wide sense;*
- *The existing deficiencies in health care facilities, primary school places, and local open space serving the area that will be further exacerbated if additional housing is added - new infrastructure provision must be secured and not just promised;*
- *Concern that regeneration will led to the gentrification of Tottenham, with existing residents and businesses forced out;*
- *A desire to see the distinctive existing character of neighbourhoods retained and preserved, including local heritage;*
- *The need for further detail on the types of jobs proposed to be delivered, how they will be secured for local benefit, and what the proposals are for existing local employment sites, including*

proposals to support, retain (including relocation), and grow local businesses and secure affordable workspace;

- *That regeneration in Tottenham should not be solely for, or in the hands, of major developers and landowners but should be in collaboration with the existing community*

1.18

- *The need to create more job opportunities for local people and support local people to get in to work;*
- *The need to provide properly funded facilities, activities and spaces for young people;*
- *Support local independent traders, attract higher end national retailers to the High Street and restrict betting shops and fast-food takeaways;*
- *Address overcrowding and provide for a mix of decent, secure social housing and well designed homes that are affordable to rent and own;*
- *Improve the physical environment, safety and the provision of local amenities; and*
- *Support local communities and ensure they benefit from regeneration.*

Ironically the current AAP as it stands, through its policies and detailed site proposals, ignores most of these points or its proposals would go in the opposite direction to what is expressed. See our detailed comments highlighting this throughout the AAP document.

Among the objectives stated on pp. 24-27, we support Obj. 1, Obj. 4, Obj. 5, Obj. 6 but express strong reservations with the wording, and approaches, proposed under Obj. 2, Obj. 3 and Obj. 7. Our concerns focus on 3 main themes:

- The depiction of the existing local economy and approach to local economic development, existing SMEs and businesses
- The overall scale of housing growth (+10,000 homes) planned for Tottenham and the implications this has for existing and future social infrastructure
- The approach to housing provision and to 'housing estate renewal' which permeates the AAP.

3.1 Depiction of the existing local economy and approach to local economic development

With regard to the support to the local economy, SMEs and existing businesses, Objective 2 and para 3.3 is a formulaic approach to urban economic development that is ungrounded in an understanding of the existing economy and its strengths. No mention of how existing businesses will be involved in and benefit from changes rather than be displaced by them. No mention of how the plan will ensure new jobs are quality jobs and can be accessed by local people. The Our Tottenham Local Economy section of the Charter (Appendix A) should be considered and incorporated. This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP. Site Development proposals which threaten existing viable businesses (e.g. High Road West, NT5 or Wards Corner, SS5) should be modified to protect and support existing businesses and retailers.

We note that many of the proposed Sites are designated industrial land. Such a designation is important to safeguard the sites and their usage. Where the buildings and activities are viable it is inappropriate and unacceptable to designate them for Site Allocation development. However we recognise that there may be opportunities in exceptional circumstances for a small part of such sites e. g. on some of the derelict or vacant parts, or fringes of some of the sites, to plan some housing (e. g. live/work units) or other appropriate usage

without compromising the general industrial character of the site. This should be achievable through the usual planning channels and policies, subject to the review planned to take place of all Industrial Sites. The improvements in accessibility in Tottenham should not lead to a mass conversion of employment land into housing land for the purpose of capturing increasing land values for private developers, as there is a need to (i) maintain all existing sources of employment in the Borough and (ii) maintain industrial uses in London to keep a diverse economy. Any release of employment land should be exceptional (e.g. site vacant, or derelict), minor and justified; and there should not be any loss of jobs or displacement of businesses without relocation options in the immediate vicinity. There should be 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. 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.

It is unsound and damaging to Tottenham's economy to be reducing targets for industrial floorspace and downgrading protected industrial areas while another part of Haringey Council is promoting the borough as being at 'the centre of the British manufacturing boom' (Haringey Council Press Release, Thursday 26 March). As this press release noted, employment in fashion and textiles manufacturing went up by 15% between 2009 and 2012, while it fell by 13% in London during the same period.

3.2 Overall scale of housing growth and implications for existing and future social infrastructure

The overall scale of housing growth targets (=20,000) imposed on Haringey by the latest Alterations of the London Plan for Haringey is not realistic and potentially highly damaging to the existing residents, businesses, environment and character of the borough.

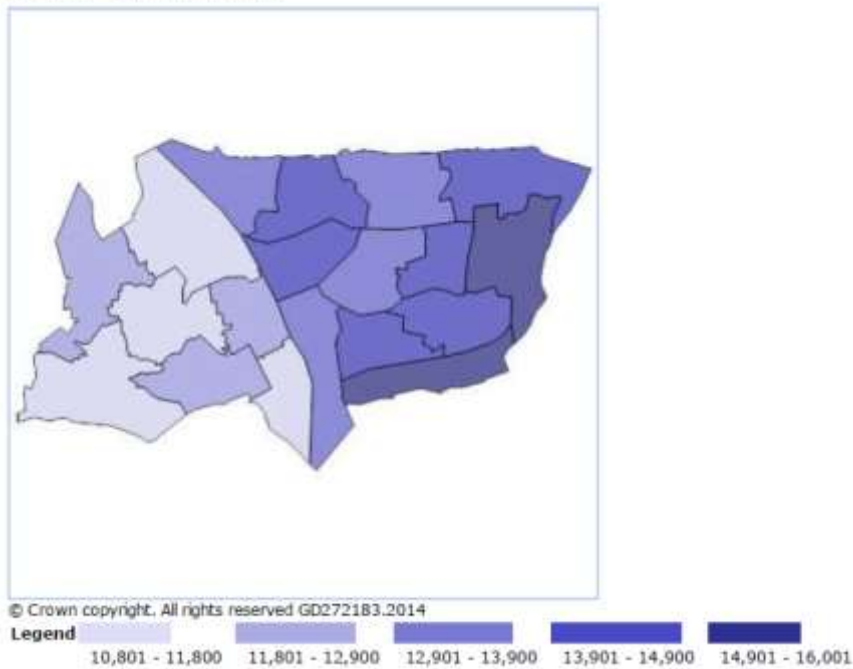
The proposal to concentrate half of the housing delivery target (=10,000 homes) in Tottenham is particularly not realistic and potentially very highly damaging to the existing residents and businesses, environment and character of the area (see our Response to the Alterations to Strategic Policies 2011-2026). 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, St 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.

QS102EW - Population density in Haringey¹ (from 2011 census)			
ONS Crown Copyright Reserved [from Nomis on 2 March 2014] The wards highlighted in yellow are located in Tottenham.			
2011 ward	All usual residents	Area Hectares	Density (number of persons per hectare)
E05000268 : Bruce Grove	14.483	93,14	155,5
E05000277 : St Ann's	14.638	109,73	133,4
E05000278 : Seven Sisters	15.968	129,20	123,6
E05000273 : Hornsey	12.659	105,54	119,9
E05000275 : Noel Park	13.939	122,97	113,4

¹<https://www.nomisweb.co.uk/census/2011/QS102EW/view/1946157250?cols=measures>

E05000279 : Stroud Green	11.758	109,46	107,4
E05000280 : Tottenham Green	14.580	136,10	107,1
E05000267 : Bounds Green	13.725	138,40	99,2
E05000284 : Woodside	14.514	149,21	97,3
E05000282 : West Green	13.372	139,84	95,6
E05000269 : Crouch End	12.395	143,99	86,1
E05000271 : Harringay	13.272	156,16	85,0
E05000283 : White Hart Lane	13.431	169,72	79,1
E05000281 : Tottenham Hale	15.064	191,15	78,8
E05000276 : Northumberland Park	14.429	188,48	76,6
E05000274 : Muswell Hill	10.784	165,16	65,3
E05000270 : Fortis Green	12.488	199,44	62,6
E05000272 : Highgate	11.632	249,89	46,5
E05000266 : Alexandra	11.795	261,27	45,1

Q5102EW - Population density



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. 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.

How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in this AAP. 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 AAP, 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 in the AAP.

There should be a strict policy of protection of existing community centres - some of which are under threat or seeking renewed 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.

We consequently demand that any new development encouraged by the AAPs should not lead to any net loss of social infrastructure, and should include additional social infrastructure to serve the existing and future residents in and near Tottenham, in particular:

i. Adequate levels of GP and health services provision:

In London the average is 1639 patients per GP, according to a Kings Fund report on 'General Practice in London'². However, by going through the information for each practice provided for patients on <https://www.myhealth.london.nhs.uk/>, we can show that the average for Tottenham GPs is 2002 patients each, as outlined in the table below³. Thus Tottenham GPs have 22.2 per cent more patients on their list, on average, than London GPs in general.

Patients per doctor in Tottenham					
Name of surgery	Map ref *	Map ref*	No. of patients registered	No. of GPs** in the practice	Patients per GP
Spur Road Surgery		2	970	1	970
Dr AUK Raja		12	1019	1	1019
Dr RS Caplan & Partners		22	6660	5	1332
Dr K Sivasinmyanathan & Partner		1	2913	2	1457
Dr R Singh & Partner		25	3028	2	1514
Tynemouth Road Health Centre		19	9116	6	1519
THE BRIDGE HOUSE SURGERY		24	9903	6	1651
West Green Surgery		4	7525	4,5	1672
Dr DK Kundu		20	1698	1	1698
Lawrence House Surgery		3	10507	6	1751
Dr DK Suri	2		1887	1	1887
JS Medical Practice		5	3860	2	1930
Dr AP Ansari		10	1978	1	1978
Charlton House Medical Centre		23	6140	3	2047
Dr ATM Hoque		11	4334	2	2167
Park Lane Medical Centre	6		2345	1	2345
Somerset Gardens Family Health Care Centr	7		11929	5	2386

²http://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/general-practice-in-london-dec12.pdf

³Data on the GPs was collected from <http://www.nhs.uk/Service-Search/GP/LocationSearch/4> and <https://www.myhealth.london.nhs.uk/>, taking in all practices which are within one mile of St Ann's Hospital and/or 639 High Road, N17 and which are also located within Haringey boundaries.

The Old Surgery 572 Green Lanes		13	2469	1	2469
Grove Road Surgery		8	2661	1	2661
Havergal Surgery		14	5444	2	2722
Dowsett Road Surgery	5		3037	1	3037
Bruce Grove PHCC		16	8979	4	2245
Westbury Medical Centre		18	8169	6	1362
The Morris House Group Practice		15	11722	2	5861
Broadwater Farm Health Centre		9	3549	1	3549
Dr KR Jeyarajah & Partner	3		4345	1	4345
CASTLEVIEW SURGERY	4	21	8979	4	2245
Total			145166	72,5	2002

So in effect Tottenham is short of over one fifth of the GPs it needs even before we have an extra 10,000 or so homes as envisaged in the Tottenham regeneration plans. The existing situation may even be worse than that for at least three reasons:

- The number of GPs in this calculation assumes that they are all working full-time, except for one who says on the practice web site she is part-time and was counted as half. If other GPs are in fact working only part-time, the number of patients per *full time equivalent* GP would be higher.
- As a deprived area with therefore a relatively high incidence of various illnesses, and moreover many people for whom English is not their first language, Tottenham probably imposes on GPs a heavier workload per patient than the London or national average.
- Since Tottenham is characterised by a highly transient population with many migrants and students, the proportion of the resident population actually *registered* with a GP may be unusually low. If all who are entitled to be registered did register (regarded by the NHS as a desirable goal to keep people out of A and E departments) the number of patients per doctor might rise considerably.

This raises the question of what specific plans are being made for extra health infrastructure in the Area Action Plan and Site Allocation documents. This is simply not clear. If an extra 10,000 homes bring in an extra 25,000 people (the exact number obviously depends on the size of dwellings and the vacancy rate), this population would need an extra 15 GPs to provide for their needs at the London average ratio of patients to doctors. A further 16 GPs are needed to reduce the patient/doctor ratio for the *existing* registered patients to the London average. This makes a total of 31 doctors needed for the N15/N17 areas. It is unrealistic to think these can be accommodated within the premises of the 25 existing practices listed in the attached spreadsheet, even if all the partners working there wanted to take on new colleagues. So a number of new doctors' surgeries will be needed and provision for them needs to be made within the land allocations for social infrastructure.

This has important implications for the future of the St Ann's Hospital site. It is a large area of land currently devoted to health service use and capable of housing one or more GP practices, possibly also an urgent care centre, which would serve the N15 area as a whole. This would be the obvious and probably the most economical way to address the 'doctor deficit' in South Tottenham. However it is too far from the new housing developments planned around High Road West and the northern part of N17, for which additional health use land will be needed.

ii. Adequate levels of quality, public open space (including major new spaces to address areas of deficiency), play areas and sports facilities:

Based on the London Plan's public open space hierarchy, around 50% of Haringey is deficient in public open green space. In addition, using the Mayor's *Guide to Preparing Open Space Strategies - best practice guidance of the London Plan*, there are also huge areas of deficiency in allotment provision, children's play areas, sports pitches and nature conservation areas. These officially recognised criteria for assessing deficiency are minimums. The London Borough of Haringey Open Space Strategy - Action Plan (November 2005), Objective 1.2, reads: *'To adopt the GLA Guidelines for provision of the different types of open space as the standard to which Haringey will work towards.'* *'Priority: High' 'Timescale: Immediate'*.⁴ That Action Plan still applies. To achieve minimum standards requires a massive expansion of provision. So the AAP and Site Allocation DPD need to make very significant provisions to deliver not only the missing open spaces but also any additional open space needed to cater for any future growth in the resident population of Tottenham.

Parks: The *Haringey UDP 2006* states: *'Haringey's open space falls below the National Playing Field Association's 2.43ha per 1000 of the population, standing at only 1.7ha'*. This is a substantial shortfall requiring an increase of 43% just to meet minimum standards. The *LBH Open Space Strategy* para 3.7 further recognises that Haringey residents have far less open space per resident (590 residents per ha) than the London average (363 per ha).

Allotments: The *LBH UDP* recognised that there's *'an estimated requirement for up to 1552 plots of [additional] allotment land'*. This represents an additional 31ha, according to the *Atkins Assessment*, on which this is based [*Atkins Vol. 1, para 8.67*]. However, *Atkins Vol 1, para 8.55* states: *'The way in which plots are promoted and publicised also influences demand. At present very little active promotion and publicity has taken place'*. Even to achieve the artificially low number of total plots required, every ward should have an average of around 175 plots (about 15 plots for every 1000 residents). For example, the three wards in South Tottenham currently have a combined total of 63 plots and hence require an additional 462 plots to meet needs. There are only 63 plots for the whole of N15 and only 22 plots in the N4 area of Haringey. There are no plots at all in Bounds Green, Bruce Grove, Harringay, Hornsey, Noel Park and Northumberland Park wards. The only site in St Ann's ward has just 8 plots, and the one site in Tottenham Green ward only 21 plots, therefore residents in those wards have little chance of obtaining a plot near to them. There are in fact 11 wards in Haringey which have less than 0.24 ha of allotment space per 1000 residents. Many residents are on waiting lists for allotments.

Children's Play Areas: the NPFA minimum standard for children's play is 0.2-0.3 ha outdoor equipped playgrounds and 0.4-0.5 ha informal play space per 1000 population, i.e. 0.6-0.8 ha children's play space per 1000 residents. There should be a Local Area for Play within 60 metres of all homes, and a Local Equipped Area for Play (with at least 5 types of play activity equipment) within 240 metres. To achieve minimum standards requires a massive expansion of provision.

Areas of Nature Conservation and Reserves: As recognised [*LBH OSS* para 3.27], English Nature minimum standards recommend there be Local Nature Reserves of 1 ha per 1000 residents - currently in Haringey

⁴ The LBH website has maps of areas of deficiencies for various types of open space: http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/openspace_rec.htm

It should be noted that some of the Council's definitions of deficiency do not meet the London Plan standards so the actual areas of deficiency are greater than shown on some of the maps.

there is only 0.16 ha per 1000, therefore requiring a 7-fold increase. *LBH OSS* 3.28 recognises that the LPAC/GLA standard for areas of nature conservation value is a catchment area of 280 metres. *LBH OSS* 3.28 suggests this 'could potentially be addressed by creating additional habitats on sites where none currently exist'. While additional habitats on existing sites are to be welcomed, this will not come near to addressing the deficiency unless a substantial number of new sites are created.

Outdoor sports pitches: The *Council's Open Space Assessment* [The Atkins Study] recommends that the 'minimum standard of access to outdoor sports pitches within Haringey should be that "All households should be no more than 280m from an outdoor sports pitch in secured public use". To achieve this minimum standard requires a massive expansion of provision, including the creation of new green spaces.

In terms of sports facilities, The Haringey Open Space and Sports Assessment (2003) provides excellent information on the need to address deficiencies of a whole range of much needed facilities. Since then the population of Tottenham has increased greatly, and is projected to increase even further. The Council has produced a number of useful sports-related plans including: LB Haringey Sport and Physical Activity Action Plan 2005; LB Haringey Tennis Development Plan - 2010-2013; LB Haringey Football Development Plan - 2009-2012; LB Haringey Football Development Plan - 2009-2012. As an example, the Football Development Plan (Section 4 - Key Issues and Recommendations) contains detailed and useful recommendations about facilities, education, club development, health, Voluntary Sector development, girls and women's development, disability development, celebrating cultural diversity, coach education, and disaffected young people. Key recommendations regarding facilities include:

- 'develop additional pitches and ancillary facilities in the east of Haringey where quality facilities and provision are most needed'
- 'develop Service Level Agreements with a number of schools to extend community access to school facilities and to implement dual use'
- 'develop the use of s. 106 agreements to create or improve local sports and leisure facilities. The population in Haringey is set to rise.... Haringey Council is responsible for providing the growing community with sport and recreation facilities that are accessible and inclusive to meet the demand of an increasing population'.

Here are some extracts from the Summary of the **Football Development Plan** regarding Facility development:

Accessibility: The Haringey Open Space and Sports Assessment identified a 400m walk as the appropriate catchment for football pitches. At present, around half of the population of the borough is outside such a catchment.

Localised facilities: To seek to provide at least one multi-use games area in each of the 19 wards in the borough, to support local efforts to expand the small-sided game. Reviewing the size and quality of the hard play areas at all 62 primary school sites in the borough and making improvements as appropriate, to facilitate skills training for the 5 - 11 year old age group.

Overall sports participation rates: The overall rates of sports participation in Haringey are below the regional and national averages, according to the 2008 Active People survey. Participation by under-represented groups: The Active People survey found participation amongst under-represented groups such as women, BME groups and disabled people is disproportionately low in Haringey.

Football conversion rates: FA data shows the proportion of footballers as a percentage of the overall

population is significantly lower in Haringey than for London or England as a whole. The mini-soccer figures are lowest of all, with conversion rates only 20% of the national average.

Small-sided football: Small-sided football is poorly developed at junior level, with no teams at all in the borough. Eight of the 19 wards in Haringey do not have a kickabout area at present.

Pitch provision: There are currently enough football pitches to meet existing demand in Haringey, but the number of pitches per capita is well below regional and national averages. This suggests current provision is only adequate because local demand levels are suppressed, possibly as a result of the lack of pitch supply. Quality of pitches and ancillary facilities: 17% of all football pitches are in poor condition, 22% do not have access to changing facilities and 60% do not have any on-site social facilities.

iii. Adequate levels of school provision (and other educational facilities):

According to a report compiled by Haringey Council in 2013⁵ there is already a shortage of school places in various part of the Borough, in particular Tottenham. This report provides an extensive and detailed picture of the existing situation. Surplus capacity at school reception level is already incredibly tight. The Published Admissions Number are projected by the Council to be in deficit against the GLA's projections by 143 needed reception places by 2023 for Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Grove wards (p. 41). Secondary school places will be in deficit by 10% by 2021/22. Appendix 12 of the report analyses the implications of the proposed new housing developments in identified growth areas (most of which are located in Tottenham) for school place planning, and states that to support the inevitable demand that will arise from the provision of more than 6,000 units across the area, *'planning for further capacity within local primary and secondary schools as well as any special school provision will be an important component in ensuring that additional school place provision is joined up and sustainable'* (p. 67). The report goes on to recognize the huge challenge posed by the need for further school provision, for example in Northumberland Park: *'Schools in the local area are at or close to capacity at primary reception level and even before the grant of planning permission for additional units at Spurs and at Canon Rubber we were aware of the need to increase local capacity. The provision of a two form entry primary school by EACT Free School, Hartsbrook Primary, which opened in September 2012, went some way to relieving local pressure for places, but, with the roll out of the development outlined above, we are aware that we will need additional provision...There are physical constraints at almost all of the existing local school in the area meaning expansion of existing schools will be challenging at best'* (pp. 69-70).

3.3 The approach to housing provision and to 'housing estate renewal' which permeates the AAP

Obj. 3 proposes a 'different kind of housing market'. We oppose the wording and the approach suggested by this. The undertone of this is that social housing concentration is "wrong". We strongly contest the type of 'estate renewal' proposed here. Behind the word 'a more balanced mix of housing tenure and greater housing choice' is in effect a strategy of demolition of existing social housing units and blocks, with a net loss of the total social housing stock, and without input for the affected residents. We therefore strongly challenge the approach taken in

⁵http://www.haringey.gov.uk/school_place_planning_appendices_2013.pdf

PolicyAAP2 Housing:

To better address the concerns of viability in delivering renewal on Haringey's housing estates in Tottenham (as listed in Alt53 of the Alterations to the Strategic Policies Local Plan), the Council will support higher density mixed tenure development in accordance with C above, as a mechanism to

- a. improve the quality and range of affordable housing options,*
- b. better address housing needs in Haringey;*
- c. secure a more balanced community; and*
- d. increase housing delivery in Tottenham*

In our previous response to the March 2014 consultation on the AAP for Tottenham, we expressed a strong disagreement with the description of Northumberland Park area and the approach advocated for its 'renewal'. The depiction of the area, as well as of all other council housing estates in the new draft of the AAP presented in February, have not taken any of these concerns into account (expressed by many residents' and tenants' associations across Tottenham). The redlining of so many council housing estates in Tottenham as part of the AAP is wrong. We reiterate and justify our grave concerns here:

There are several statements in the document about the fact that concentrations of social housing are viewed as a negative feature which should be addressed through 'mixed tenure' and 'mixed communities' policies. We would argue that the existence of substantial single tenure genuinely affordable and secure housing in North Tottenham is a positive, and certainly not in itself detrimental or the root cause of the 'problems' of the area. 'The legacy of poor land use, typified by many 1960s housing estates' is not a fair representation of the views of many of their residents. See comments made for NT1 and NT2 and in the overall response letter to this AAP.

We question the claim that housing regeneration through estate renewal and new build has the potential to create new residential neighbourhoods and improve the quality, mix, tenure of housing in the area if this is done via demolitions, a net loss of existing social housing units, and the creation of highly divided new developments with gated/separated market-rate housing in areas of existing social housing. Such development would also increase densities unacceptably, reduce the green and amenity space serving the occupants, and cause unnecessary social disruption to the estate's community during the works. We strongly disagree with the notion that a significant change in the housing mix of the Northumberland Park area through major estate renewal and the introduction of more private and shared accommodation would improve the issues and problems of the area. The objective of 'mixed and balanced communities' should not be done through demolition or a reduction in the net stock of social housing, insufficient community participation, overall net loss in the number of social housing units after regeneration, decanting of the original population and gentrification as unfortunately has been the case in other parts of London (Woodberry Downs in Hackney, Aylesbury in Southwark...).

If such a policy is applied only to social housing residents (as it is here), it is clearly discriminatory and arguably unlawful.

There has been a lot of research done, over the past fifteen years, about the effectiveness of such policies in dealing with socio-economic deprivation, the social problems of an area and generally the regeneration of a neighbourhood. Such policies are based on the notion of the '*neighbourhood effect*' (or *area effect*), which hypothesizes that a high concentration of poor, or ethnic minority, people in specific areas reinforces and perpetuates poverty and exclusion. The key assumption is that mixing different types of housing tenure would lead to greater *social mix* and to positive effects for (poor) urban residents and for deprived neighbourhoods at large. This is achieved by getting higher income groups to live there. [We note that this 'policy' is rarely enforced by ensuring that development in richer neighbourhoods leads to the balance in those 'imbalanced' communities being restored.]

The conclusion of the majority of the studies carried out in the UK and in countries where similar policies have been carried out is that there is rather limited evidence that interventions in the housing mix alone can lead to greater social mix and to positive effects for deprived urban neighbourhoods and their residents, in particular tenure mix interventions in social housing estates.⁶ Often old and new residents live parallel lives side by side with little contact. Social worlds, places of consumption and socialisation are markedly different (different supermarkets and pubs, for example), and newcomers often send their children to private schools outside the area. Additionally, mixed-tenure neighbourhoods do not necessarily lead to an improvement in the quality of local services and amenities if there is no parallel public investment and if the incoming middle-class households consume such services outside the neighbourhood or recur to the private sector. There is no evidence that ‘the new resources that may come with higher income residents (e.g. shops) either materialise or are beneficial to people on low incomes’⁷, for example through job opportunities.

Whilst it is true that residents in areas of concentration of social housing, such as Northumberland Park, suffer considerably worse outcomes than the national average for selected indicators of deprivation (e.g. income, general and mental health, educational attainment, benefit claims), the causal explanation for this does not reside with the fact that they live in a mono-tenurial area. Sociological research has clearly shown that individual and family characteristics are more important than the *neighbourhood* in explaining individual life trajectories. Research has even shown that in some cases mixing policies can have negative impacts on low-income or ethnic minority groups, because, through the influx of new residents and new services, such interventions may break social networks and endanger businesses catering for a low-income population or for specific ethnic minority groups, leading to more class or ethnic conflicts. Many sociological studies have since long shown that a degree of concentration may benefit particular social or ethnic groups, which means that an imposed de-concentration may break crucial community ties. The presence of family networks, small businesses, support organisations and informal networks can support the process of survival and of socio-economic integration or social mobility. Social mix policies were provocatively labelled ‘faith-based displacement activity’ by the respected LSE economist Paul Cheshire (2009), who argued that they treat the symptoms of urban deprivation and inequality rather than tackling its causes.⁸

⁶See among others:

ARBACI, S. and RAE, I. (2013) *Mixed tenure neighbourhoods in London: policy myth or effective device for social mobility?* In: International Journal of Urban and Regional Research, 37(2), pp. 451-79.

CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: International Regional Science Review, 32 (3): 343-375, 2009.

CHESHIRE, P. (2007) *Are mixed communities the answer to segregation and poverty?* York, Joseph Rowntree Foundation. Available at: <http://www.irf.org.uk/publications/are-mixed-communities-answer-segregation-and-poverty>.

CHESHIRE, P., GIBBONS, S. AND GORDON, I. (2008) *Policies for ‘mixed communities’: a critical evaluation*. London, UK Spatial Economics Research Centre. Available at: <http://cep.lse.ac.uk/textonly/SERC/publications/download/SERCPP002.pdf>.

LUPTON, R. and FULLER, C. (2009) *Mixed communities: a new approach to spatially concentrated poverty in England*. In: International Journal of Urban and Regional Research, 33 (4): 1014-1028.

MIXED COMMUNITIES EVALUATION PROJECT TEAM (2009). *Evaluation of the Mixed Communities Initiative Demonstration Projects. Initial Report: Baseline and Early Process Issues*. London, DCLG. Available at: <http://eprints.lse.ac.uk/27143/>

MIXED COMMUNITIES EVALUATION PROJECT TEAM (2010) *Evaluation of the Mixed Communities Initiative Demonstration Projects. Final report*. London: DCLG. Available at:

<https://www.gov.uk/government/publications/mixed-communities-initiative>

TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>

⁷TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

⁸CHESHIRE, P. (2009) *Policies for mixed communities: faith-based displacement activity?* In: International Regional Science Review, 32 (3): 343-375, 2009.

Altogether, in the UK, there is thus ‘substantial evidence that areas with more mixed social composition tend to be more popular, more satisfying to live in, and have better services than poorer areas’, but ‘to date the evidence is limited that neighbourhood has a large effect on individual outcomes, over and above individual and household factors. Nor is there robust evidence that neighbourhood mix per se or changes to mix (over and above other neighbourhood characteristics) is influential’⁹. The authors of the evidence review commissioned by the DCLG in 2010 on the evaluation of past mixed communities policy conclude that it is *not* evident that mixing communities are a more effective strategy for the regeneration of disadvantaged neighbourhoods than traditional neighbourhood renewal approaches – i.e. those which target public resources to particular areas to support integrated strategies of social, economic, and physical regeneration in partnership with local residents: ‘if there had to be a crude choice between traditional urban and neighbourhood renewal and mixed communities policies to address the top quarter most deprived local authorities (as Neighbourhood Renewal Fund did) or even the most deprived 10% or 5% of wards, the evidence suggests the former offer more limited but better-evidenced benefits at lower costs, and are also more achievable during a recession. If there is a choice between doing nothing in deprived areas and doing something, the evidence suggests doing something. The evidence suggests that:

(a) There should be continued support for ‘traditional’ urban and neighbourhood renewal, which might include a modest mixing element.

(b) On the precautionary principle, and on the grounds that the costs of preventing non-mix are lower than those of altering it, mix should be encouraged in new developments, and through any schemes to support developers and registered social landlords during the housing market downturn.

(c) Mix should be considered in existing areas through methods such as pepper potted-tenure change, tenure blurring, sensitive allocations policy and targeted fiscal stimulus’.¹⁰

For the Northumberland Park area and for the rest of Tottenham, this means that:

- 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 and residents as part of any plan for the area. The approved development of the Tottenham Hotspur’s FC has been done at the expense of the surrounding population’s needs and the retreat of the Council with regard to S106 contributions (in particular affordable/social housing, but also the £17m contribution for local community infrastructure) from the developer in Feb. 2012 is a grave mistake that should be renegotiated and not be repeated in any future development in Tottenham.

Regarding the new homes to be built in Tottenham, the AAP *Consultation Document* seems to indicate that they should be overwhelmingly for private market rent, near private market rent, private sale or shared ownership. No mention is made of low cost rental options. This is a clear weakness in the plan. The word “tenants” does not appear in this APP (despite being the majority tenure throughout Tottenham and Haringey), but “owners” appear 46 times. 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

⁹TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

¹⁰TUNSTALL, R. and LUPTON, R. (2010) *Mixed communities. Evidence review*. London, DCLG. Available at: <https://www.gov.uk/government/publications/mixed-communities-evidence-review>, p. 3.

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.

We demand that the new housing to be built in Tottenham should be high quality and genuinely affordable. An affordable home is one that is affordable to any tenant earning the London Living Wage. 'Affordable' is not 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. 70% of such new build affordable housing should be social housing. There should be a mix of unit sizes and types to suit local needs, based on evidence – e.g. more provision for large family dwellings, no over-provision of small flats.

A quality home means all of the following: secure; physically comfortable (with adequate indoor space to at least 'London Housing Design Guide 2010' standards i.e. Parker Morris standards plus 10% more space - and to outside garden space); in compliance with, and not exceeding, the density matrix as set out in the London Plan; built to 100% lifetimes homes standards. Design 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. The Lifetime Neighbourhoods principles [See the London Plan for one iteration of these principles] should apply. 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.

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

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 AAP.**

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 TOTTENHAM AAP PREFERRED OPTION CONSULTATION DOCUMENT

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

5. SUPPORTING EVIDENCE & APPENDICES

A1: Our Tottenham Community Charter

A2:

A3: Friends of Down Lane Park official response to consultation on Haringey Council planning documents, including the Tottenham Area Action Plan.

OUR TOTTENHAM A COMMUNITY CHARTER

Planning & Regeneration by and for the Community

Adopted at the Our Tottenham conference, April 6th 2013. Amended at the conference, Oct 11th 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 6th 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 11th 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, Efiaba 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

Appendix A2: Local traders condemn 'sham' Council consultation for North Tottenham High Road West

Our Tottenham

OUR VOICES OUR HOMES OUR NEIGHBOURHOODS

Information: www.ourtottenham.org.uk Twitter: @Our_Tottenham

Subscribe for updates: mailto:sympa@lists.riseup.net?subject=subscribe%20ourtottenham_news

Contact the Our Tottenham Organising Group: ourtottenham@gmail.com

Local traders condemn 'sham' Council consultation for North Tottenham High Road West. Backed by 4,000-strong local petition against demolitions, they call for a new scenario for the area

On Thursday 28th November 2013 a delegation of traders from North Tottenham High Road West addressed the Council's cabinet meeting. They presented their 4,000-strong petition in which local people rejected the demolition of the area. The traders condemned the consultation over the future of the area as a 'sham' and said they had been lied to by the Council. They also condemned the report of the consultation that had excluded or sidelined most of the objections. They called on the Council to *'freeze this planning process and sit down to design a new Scenario, one that includes this Business Community and allows it to move forward and grow within the regeneration process, not be excluded from it.'* Their powerful presentation is included below in full.

It should be noted that many Councillors are at last beginning to criticise the Council's plans. At the meeting, Cllr Meehan referred to a recent Guardian expose which showed that THFC had a property company recently re-registered 'offshore' in the Bahamas - he called on the Council to condemn Tottenham Hotspur FC for buying up shops and businesses under threat, describing this as *'making a killing'* and a *'fire sale'*. Cllr Bevan asked the traders' rep to tell the Cabinet how a THFC official had allegedly tried to buy up local shops a year ago, telling owners they could otherwise lose everything - the official apparently showed traders some unpublished Council redevelopment plans for the area long before they had even been made public let alone consulted over. Cllr Stanton said the process of demolition and redevelopment was recognised throughout London as *'social cleansing'*. Cllr Winskill, the Chair of the Overview &



Scrutiny Committee which met on the previous Tuesday, said then that *'we are talking about a massive socio-economic transformation of the area'* and asked *'who is the redevelopment of Tottenham for?'* At that same meeting Cllr Bull, the former head of the Scrutiny Cttee, said *'I still have a niggling concern that we rolled over far too quickly on the section 106 on Spurs'* [in which the Council allowed THFC to abandon its agreed obligations to build affordable housing and to put 16m into the local community]. *'It just seems like everything is Spurs, Spurs, Spurs, Spurs, Spurs at the expense of everything else.'*

In reply the Council leader, Clare Kober, agreed that any *'making a killing'* tactics by THFC's property arm would be unacceptable. Regarding criticisms over gentrification and *'social cleansing'* she recognised that there was *'an affordable housing crisis'*, which was a *'crucial'* challenge *'for ordinary working people'*. The plans would be looked at again to take into account all that had been said and a new *'masterplan'* for the area would be drawn up and consulted on in the summer of 2014.

THE TRADERS' PRESENTATION

" This business community has been part of the fabric of Tottenham in most cases for over 20 years and in some cases for more than fifty. Are we to be thrown out to make way for a Football fans Walkway?

This petition with over 4000 signatures shows overwhelmingly that local people are against this. These figures should have been added into the recent High Road West Consultation, here today for approval. The result would have been a resounding NO to your present plans. However this was not allowed to happen. When we presented it to Alan Strickland in June he neglected to tell us the petition had to be formally presented and so the figures were never included.

There has been no engagement with local business about the development of this Regeneration plan. We have been lied to and lied to by our own elected representatives. The key decisions for this master plan were made long before the consultation. Key factors were decided at the beginning of 2012. Thats when our small businesses were sacrificed in order that one very big business could become even richer.

The demolition of our shops and businesses became a non-negotiable in every master plan scenario. Where is the Democracy in that? That is why we began this petition to give the community a chance to show how they felt about it. An option to comment, which was not given to them in the consultation forms



Have we have come through recession and through riots to have our businesses blighted like this? Are successful businesses that we have worked and developed over many years to be snatched away and given to developers for their profit?

The consultation is a sham. It is not an independent study. Figures are inaccurate and manipulated to achieve the preferred Scenario.

The plans were misleading: marking new buildings for community use when they will in fact be retail outlets which incorporated community facilities.

The 68%, which has been widely quoted as a figure that shows overwhelming support for the demolition plans, is not justified. As a percentage of the total households on the estate it is just 40%. In the wider community of 4000 homes and businesses it is just 3% in agreement. That's using the figures quoted in the report and of course 70 of the business replies were never included in the figures but were placed in the appendix to the consultation report.

*Regeneration is not about providing a football venue or boosting land values to justify an investment. The council should not be acting like a Corporation.
Regeneration needs to create hope for the existing community by building a better neighbourhood.
Regeneration is not about moving the existing community OUT so more up-market people can move in.*

In 2011, after the riots, the council ran an I Love Tottenham campaign. Its tag line was Support your Local Traders. It needs to stand by that promise today.

- Recognise the value of the established community and its contribution over many years.*
- Recognise and accept the wishes of this community as presented now in this Petition.*
- Freeze this planning process and sit down to design a new Scenario, one that includes this Business Community and allows it to move forward and grow within the regeneration process, not be excluded from it. "*

11.2014 - Note: Since the above, the Council has so far failed to respond to calls for genuine dialog with the threatened local businesses, or to amend their 'masterplan' for the area to take note of the businesses' views.

Statement from the Our Tottenham Organising Group - 28.11.2013

NORTH TOTTENHAM HIGH ROAD WEST CONTROVERSY DEEPENS

**LARGE SCALE OPPOSITION EXPRESSED TO COUNCIL EVICTIONS AND
DEMOLITION, DESPITE MISLEADING AND CONTROVERSIAL CONSULTATION
AND REPORT**

- Traders condemn the threat of evictions and demolition, and lobby Council Cabinet (28th Nov)**
 - Thousands of local people sign petition against demolitions**
- Council tenants demand guarantees of better replacement Council homes in the area, if any demolition goes ahead**
- Campaigners demand the Council ensure anyone evicted is rehoused in secure, genuinely affordable, local homes and fully compensated**
- Campaigners re-state their calls for THFC to pay £100m for improvements to existing homes, shops and community facilities**

On the 8th October the Council circulated an initial draft Report of the 'consultation' they carried out in May/June 2013 in the threatened area of Love Lane estate and its neighbouring shops and businesses in North Tottenham High Road (opposite the Spurs ground). The draft report was revealed to uproar at a meeting of local traders on October 8th, who condemned the report as biased. They



are planning a deputation to the Cabinet meeting on 28th November to present 4,000+ signatures *[figure provided to us]* on their petition against demolitions. In fact the consultation responses show deep concern and mass opposition to evictions and demolitions *[see Summary, below]*, despite the Council's totally biased and inadequate consultation tactics *[see 'Biased consultation condemned, below]* and the report's consultants' attempts to spin the results favourably for the planned objective - a 'Stadium Approach' road through the area to benefit Tottenham Hotspur Football Club (THFC) and their new 430m stadium project.

A spokesperson for the Our Tottenham Organising Group said: *The Report results reveal true scale of opposition. Despite all the bias and spin, the Report results demonstrate considerable opposition to the proposals. In particular, even where demolition is apparently supported, this is clearly because the Council tenants expect re-housing for local residents in secure, genuinely affordable, new homes at the site. As fellow residents we send our solidarity to the local residents and traders, and call on the Council to work with them in a genuine partnership.*

Biased 'consultation' condemned Campaigners from Our Tottenham and Haringey Defend Council Housing, and local traders, have condemned the consultation context and tactics. These are some of the background issues:

- The Council's 'Plan for Tottenham' issued in 2012 showed a 'Stadium Approach' road proposed to go through the Love Lane estate
- Residents attending Haringey Defend Council Housing meetings on the estate last spring (around 50 took part to express their concerns over the threat of demolition) reported that the Decent Homes works to replace kitchens and bathrooms in the 1960s-built estate have not been done in most of the blocks, as if decisions about its future had already been made 'from on high'.
- A key condition of allowing Tottenham Hotspur to expand its ground had been that it would have to put 16m into the surrounding area. For example this could have been used to provide improvements (eg concierges) for the Love Lane estate. The Council's Planning Committee allowed THFC to drop this obligation after the club pleaded poverty. The Council had then agreed it would instead contribute 5m of public funds towards the shortfall by selling off land on the Love Lane estate. In reponse, Our Tottenham campaigners re-stated their calls for THFC to pay 100m for improvements to existing homes, shops and community facilities - a demand put to THFC directors during negotiations with them in July 2013.
- Original thoughts that any consultation would give people the option of saving the current estate and shops was abandoned and the 3 so called 'consultation' options ended up being 'part demolition', 'half demolition' or 'full demolition'.
- However, even these biased options were not clearly put on the consultation form, so people could not add 'none of the above' or put a line through the 3 options. Instead the only part of the consultation form that referred to the 3 'options' was a general comments box at the end which asked for comments about *'the three options outlined in the High Road West Creating a Plan for Change' document* ...[ie people would have to hunt out, read and digest a detailed 20pp document whilst filling in the Questionnaire] *'...as well as any other general comments you have'*.
- None of the questions on the form referred to 'demolition' or 'evictions', but instead to 'redevelopment' and 'regeneration', and gave the clear impression that local residents and shops would all benefit from improved housing and facilities.
- A Tottenham Councillor who criticised the consultation documents has since been removed from the ruling Labour Group

Summary of Report The report dated August 2013 has finally been officially published as part of the documents for the Cabinet meeting on 28th November. The report is very confusing document and the results have been presented and spun in the best possible light for the Council's clear drive to demolish and redevelop the whole area. Consultation is increasingly seen as little more than a pro-council propagandea exercise - eg:

1. The key question was never asked, ie whether people were for or against demolitions!
2. The 3 Council options, of partial, half or total demolition of the Love Lane estate and surrounding shops, were also never explicitly put so respondents were prevented from opposing all 3 or just adding none of them.
3. The words demolition or evictions were never used.
4. All the questions painted a rosy picture of improvements and redevelopment to benefit all the members of the existing community.
5. The Council have made promises of re-housing on site for the Council tenants affected. We noted that experience of similar developments around London has shown that this rarely happens as the community gets broken up and the % of unaffordable replacements gets increased. But what would not have been clear to all is that private tenants would be made homeless and leaseholders bought out and unable to afford to stay in the area.
6. Thousands of local people have signed a local traders petition against demolitions. This was mentioned but not taken into consideration.
7. 524 consultation forms were returned, 207 from residents of the estate.
8. 62 forms filled in by local customers at a threatened shop explicitly opposed all demolitions. These 62 were sidelined in the report as a petition.
9. Unsurprisingly, in the light of some of the forms language/propaganda, and the Councils misleading promotion of the redevelopment plans, and some of the Councils promises made, some of the respondents welcomed promised improvements. For example 76 residents of the estate agreed that all properties on the estate *should be included in the redevelopment plans*. This has been used as the key statistic to demonstrate 'widespread' support for mass demolition. But many of these also expressed strong concerns about the effect on the community and also demanded that any replacement homes be Council housing and no public land be sold off. On page 37 the report says: *'Love Lane Council tenants want to maintain their security of tenure and their existing rent levels.'*
10. There was mass opposition from local shops and businesses

11.2014 - Note: Since the above, the Love Lane Residents Association has produced a report in which they call for, in the event of any redevelopment, all Council tenants to remain as such, and all other residents to be able to return to the estate. Meanwhile, the Council so far refuses to guarantee this, and has admitted it doesn't even have a development partner or the funding for any redevelopment.

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, Efiaba 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

Appendix A3: Friends of Down Lane Park official response to consultation on Haringey Council planning documents, including the Tottenham Area Action Plan.

Forwarded by Martin Ball, Chair of the Friends of Down Lane Park.

27th March 2015.

1 The Friends of Down Lane Park

1.1 The Friends of Down Lane Park is an organisation bringing together local residents and park stakeholders to lobby for improvements to the park and to assist Haringey Council's management of the park. The Friends hold public meetings, organise events in the park, and are active in the debate over the future of the park and surrounding areas.

1.2 Down Lane Park is at the heart of the local community, For those people living near it and for those using it, the park is the most precious thing possible. It offers a place of relaxation and a place of recreation. A vital resource in an area of flats where a significant number of residents don't have access to private gardens or can afford the financial cost of participating in exercise.

1.3 The Park is used by a wide variety of people. There are teenage football matches at the weekends, and a football club for youngsters runs two-three times a week. This club runs more in the school holidays. There is regular sports playing, including high use of the popular tennis courts, and an outdoor gym, and there is often volleyball using a net strung between a tree and a lamppost. There are dog walkers, people walkers, and people cycling though. In addition, there is a private nursery and a bowling club.

1.4 The park is protected from development as a Fields-in-Trust Queen Elizabeth II site, and in November 2014 received its first Green Flag Award. In achieving both of these national recognition standards the Friends have worked co-operatively with the parks department of the council. In the past five years this has been a dramatic turn-around in the condition and use of the park.

1.5 Yet much of this might not be happening if the Friends had not resisted Haringey Council 2009 plans to build blocks of flats on the southern section where the playground areas are positioned. A campaign of opposition to the plans involved 600 people in lobbying the council to protect the park, and to secure immediate investment in new playgrounds. The Friends campaign was successful in both respects.

1.6 Subsequently there have been further improvements such as the new tennis courts, new outdoor gym, new fencing, part of which was secured after Friends negotiated with TfL as compensation for a sliver of land being taken for road widening as part of the nearby road changes. This £12,000 fencing is because of the Friends lobby of TfL for compensation for the loss of park land.

1.7 Yet the ambition of the Friends and local people expressed in the park's masterplan still remain undelivered by Haringey Council. The promised MUGA (mulit-use games area), the new cafe with community facilities, the new half basketball courts, the climbing wall, and the water feature beside the

cafe are yet to be built. These are developments local people want the council to be focussed on and welcome them before any new tower blocks are considered.

1.8 The Friends group has supported the improvement programme, both in facilitating resident and user feedback on proposals to improve the park. It has also organised activities in the park, such as an annual summer festival and litter tidy-up sessions involving local people.

1.9 The Friends have established links with Business in the Community and have brokered corporate volunteering days. We are involved again this year in BitC's Give and Gain Day 2015. In 2014 the Friends brought volunteers into the park the day before a visit by the Green Flag Award judges. The volunteering days have helped the parks team to deliver improvements that local people requested but council staff couldn't put resources into doing. This includes the cutting back of over hanging shrubs along the fence on Park View Road and the removal of old hedge along the line of the new fence near the corner with Monument Way.

1.10 The Friends have pressed the council for smaller changes in and around the park that make improvements to the park and users experience. For example, recently the Friends persuaded the council to introduce the new double yellow lines on Ashley Road outside the Burdock Road junction park gate. Previously vehicles would park there and block sight of moving vehicles on Ashley Road, but also prevent safe movement along the narrow pavement. At the moment the pavement is still narrow, but there are no parked vehicles and this has improved safety as well as allowing access to the drop-down kerbs.

1.11 The Friends have also represented the view of residents in day-to-day management of the park. We led on highlighting the presence of an anti-social behaviour gang in the summer of 2013 and lobbying of the police to tackle the successful action they eventually did in combating the problem. The Friends led community complaints against the damage caused by the Mauritian Festival in 2014 and by other commercial hire of the park. The Friends also championed that the park's facilities - such as the tennis courts and any future MUGA - be there for the community and not the Harris School seeking to hire them. In the last case, we had to oppose the intention of the council leadership to do a deal with Harris whereby the community would be restricted in accessing public sports facilities.

1.12 More improvements to the park are happening in Spring 2015. This includes a widening of the path through the open land part of the park, new fencing, hopefully pink painting of the lampposts, the altering of two gateways to improve safety, and new equipment for the children's playground.

1.13 First there are comments on the frankly potty idea of a green road link and the unacceptable damage it will cause to the park and use of the park. Then, then there are comments on the various TH sites proposals where they have a damaging impact on Down Lane Park and on the current green space in the Tottenham Hale ward.

2 The green road link idea

2.1 The first thing to mention is that the Tottenham Area Action Plan section on the green road link doesn't actually refer to it passing through Down Lane Park. The park is the significant bit of green land

along the way and it is bizarre that it is not mentioned. That creates the suspicion that the proposals avoid any reference the route going through the park because Haringey Council is seeking to avoid any public discussion of the damaging impact of the route going through the park.

2.1 The green road link will damage Down Lane Park with a thoughtless planned straight link throughway. It pushes through the new fence secured by the Friends through negotiation with Transport for London, at a point where there is play equipment and a natural play area plus some trees. The route will cut through the large grassed mound that is a distinctive feature of the park and a popular play feature for younger children.

2.3 The green road link will result in security problems both for parks users and the managers of the park. At present the southern section of the park is fenced off, with access being through a gate on Park View Road and then through internal fencing to the children's playground. It is this enclosed aspect that means toddlers and young children can roam safely. They can't get out onto the road and the public can't simply wander in unseen. A new route through here ends that safety feature as well as creating management of the park issues.

2.4 The route will also result in the loss of actual park land and effectively isolate the southern edge of the park along Hale Road. The intention in isolating that part of the land might be to come back at a later date with plans to build flats there because of alleged under-use. The route also involves re-positioning or removing altogether the new play and other facilities positioned there in the past few years. The route is bizarre given that there is an existing gateway, recently restored, where people can access the playground area of the park. It is stupid to introduce a new gate a very short distance from a well-established gate, where those entering and leaving the park can be observed by those in the playgrounds.

3 Comments on other aspects of the green road link

3.1 There is no case made for the need for a new green road link from the Tottenham High Road to the Tottenham Hale station. There is already a good route along Monument Way and along Hale Road. This is a route with a wide cycle lane on the pavement along Hale Road, and a set-back path along Monument Way. Both are safe and the Monument Way stretch is picturesque.

3.2 In addition, the proposed green road link takes no account that people from the residential areas close the Tottenham High Road actually pass through Down Lane Park to use Ashley Road to get to the station. That is the desired walking and cycling route of importance from the residential streets through Down Lane Park to the transport station.

3.3 There is no evidenced need for a bridge across Watermead Way elevating green road linkers to the heights of Hale Village. There is no evidence of the public demanding a bridge or a new link. Residents can easily get around Tottenham Hale using the present road and pavements network, and cycle paths. There is no evidence that more people will go between the Tottenham High Road and the Lea Valley because a green link road is built. Or, that people would use the route? What is the basis of the claim that connectivity will be increased?

3.4 The green road link is not about linking Tottenham to the Lea Valley. Rather, it is about claiming that the developers' zone that is Hale Village has connectivity to a number of places for base marketing reasons. So, the future advertising puff for the new flats will have great illustrations of what 'vibrant' retail and entertainment areas you can reach if you choose to leave your flat using the link. The green road link idea has been dismissed in the past by the community as irrelevant to the needs of local people. It is wrong to remove existing successful businesses such as Murphy Ltd on Ashley Road from the area to enable the green road link to pass through. For a designers folly the area will lose jobs and employment land. If the existing businesses on Ashley Road are not immediately going then the green link road is going nowhere for a number of years. The dangers of starting it in stretches is that the project might be dropped and then the community is left with an unfinished and useless green road adding problems to the area.

3.5 The impetus for linking green areas and building bridges would be better applied to improving access points at the northern edge of Down Lane Park for people to get to the Tottenham Marshes and the Lea Valley. In addition, there should be improvement of the walking bridge further north linking the 'avenues area of N17 via a walking bridge over the tube lines and Watermead Way to the Tottenham Marshes. This would further open the Lea Valley to people from that residential area

4 The detrimental impact of the various sites around Down Lane Park

4.1 The park is threatened with being encircled by high tower blocks and new buildings installed as part of the Harris Federation school. If realised the proposals would result in building blocks on the north edge of the park along the recycle centre and council depot. Then there will tall buildings on the Ashley Road sites that will tower over the tennis courts to children's playground area. In addition, the south edge of the park will face on to tower blocks on Hale Road and the Welbourne site. This enclosure of tower blocks will be over-bearing on a community park, as well as the terraced housing on Park View Road. It is a park for people, not a patch of green between tall buildings.

4.2 The housing proposals for the recycle site and the current depot site could result in unsightly and too high tower blocks sitting ugly next to a community park and low-level street terraced housing. Yet the removal of the depot offers an opportunity to improve the access to the Lea Valley and the Tottenham Marshes at the northern end. This end is where a genuine green link could improve access for residents to the beauty of the Lea Valley. Achieving this would be a significant boost to environmental and health capital in the area.

4.3 The proposed tower blocks on the Ashley Road sites (TH2 and TH3) would similarly have a detrimental impact on the park and its positioning in the park. The same is true of the site along Hale Road the current petrol station (TH1), while a ten storey tower block on the Welbourne site next to a park is a mistaken judgement that stands out as starkly as such a building would. The fantasy of twenty storey towers on Watermead Way is an alarming prospect for those who would have to look at them, and a likely nightmare existence for any residents. You don't have to make a lengthy case against tower blocks that are surrounded by other tower blocks, the railway line with tower blocks the other side, and a busy road with tower blocks the other side to begin to recognise what an appalling development that would be.

4.4 A community park should not become a grassed area between tower blocks. Parks are there to replicate being in the countryside and provide an outlet for the human desire to be detached at times from the bustle of the urban world. They are great places because they are not surrounded by a screen of concrete and glass slabs. A bank of tall towers will cast long shadows over the park. It is important to remember that psychologically parks play a vital function in our lives. They provide tranquility and enable us to get away from stressful living because they are secluded or have secluded sections.

4.5 The impact of any increased number of new dwellings will be to increase usage of the park. At present the park is very busy and more local people will mean more demand for the facilities and the outdoor space the park provides for many people. For those in flats, the park will effectively be their garden and healthy outdoor play space.

4.6 To provide recreational options for people in any new flats in the area the case for a bigger park providing more open green space and more play facilities is clear. Therefore it is proposed that if the council acquires land between Hale Road and the existing footprint of the park, and land between Ashley Road and the existing footprint of the park, then that area be used to expand the park. Such an expansion would provide enhanced park opportunities for current local people and any new residents moving into the area.

4.7 The land along Fairbanks Road (site TH8) should be enhanced both as attractive landscaping along the Chesnuts Estate, but also have installed outdoor gym facilities, such an investment will provide accessible in terms of being free and locally based on the estate. It is an investment that will result in healthier and more active lives for the estate's residents.

4.8 Living in Tottenham Hale, in zone 3 of the transport network, and the Lea Valley in close proximity then residents would expect to see the sky above. Yet, the planned forest of tower blocks will substantially ruin the skyline. The area has the advantage of being open and with a rural landscape context. Yet, the plans to create a Manhattan-esque new entity threatens that and represents an architectural abuse of the area. Seeing the sky is important to human life. There are psychological benefits to feeling the warmth of the sun, as sunshine improves the mind and gives us health benefits. Living and working in the shade of the proposed tower blocks is not healthy or desirable.

5 The need for green development in the future of Tottenham Hale.

5.1 Now some points about the impact of the Tottenham Hale top-down development agenda's proposals on parks in the Tottenham Hale ward, about the need for improvements to green landscape around buildings, and about the need for new play facilities for existing residents.

5.2 The Paddock green space is in an unacceptable poor condition. Yes, some improvements have been started, but it is largely unkempt and there are areas of dumped rubbish. It could do with a significant investment to both safeguard it as a green area and enhance it as a resource for the community to enjoy. This should be a priority of the work for improving the future of the area.

5.3 The existing glass towers of Hale Village have spoilt the skyline of Tottenham Hale. People passing through are frequently critical of the green and orange face of the block along the station and railway

line. More tower blocks will increase the likelihood of people passing through the area having a negative view of the area. So far from staying, the proposals will result on people passing through quicker or potentially avoiding the area. This is an important point because of the common stereotyping of Tottenham and the worth of its residents. More ugly tall buildings make the area less attractive and less a place where residents have strong civic pride. An outcome of the council's proposals could be to make Tottenham Hale an area residents are less willing to associate with and a place where people might be put-off from living in.

5.4 This is the Lea Valley. A regional park. An area of beauty. An area of environmental importance. An historical area. The monstrous development plans will damage all of this. If the plans are ever realised then history would surely view it as a mistaken period of urban planning never to be repeated. The council's proposals need to be stopped now so that the area doesn't go in the wrong direction, with the consequences remaining with us the residents for decades.

5.5 The proposed development on Hale Wharf (TH7) is out-of-step with the character of the area. A line of tall tower blocks along the Lea will destroy the skyline, affect bird migration, and have a detrimental impact on the context of and to the area and its relationship with the river. A new Wetlands is being developed at the Walthamstow Reservoirs to encourage people to appreciate and enjoy nature more. In contrast, Haringey Council's contribution to the environment is to plonk a series of tower blocks adjacent to this development to exploit it for the sale of property.

5.6 Hale Village is an existing blot on the landscape. So, any new tower blocks (TH6) over-shadowing the Tottenham Marshes and Lea Valley would made the blot bigger. What a dreadful legacy that the future dominant view in Tottenham Hale will be of a concentrated suite of tall buildings and not the beauty of the open wildness of the marshes and reservoirs.

5.7 The housing on Bream Close and the Ferry Lane estate show how housing can be built without destroying the natural setting of those areas and providing harmonious riverside living. The buildings blend into their surroundings. Animals actually roam the green space around the houses along the waterways. It is difficult to imagine tall tower blocks having the same togetherness of nature and communities.

6 General and concluding remarks about the proposals and the detrimental impact on the lives of people living and working in Tottenham Hale

6.1 The combined building proposals of Haringey Council are monstrous and would not just damage the existing area, but probably fail to create anything other than a vacuous cluster of tall buildings. The council's agenda impacts negatively on the existing population and current community, but the proposals (TH 4 and TH5) are also not convincing on whether the planned district centre will be a great place for the workers and residents envisaged making up the future population.

6.2 An alternative agenda is very possible. With appropriate scale of buildings, the retention of employment land on Ashley Road in particular, as well as the investment in and enhancement of the green public realm then the area could offer something for current residents. A different approach will also have a better chance of creating functioning and welcomed additions to the Tottenham Hale

community. The council's agenda is about cobbling together of public land in a desperate attempt to conform to the stricture of meeting unrealistic housing targets and the profiteering of its Cannes Chums.

6.3 Haringey Council should focus on completion of the promised improvements to Down Lane Park. Then an expansion of the park, joined to a green corridor around the Welbourne site and up the side of Chesnut Estate to the Tottenham High Road, would improve the area and increase green space with all the benefits that brings. There needs to be substantial investment in the green environment of Tottenham Hale. The size of green space and facilities in Down Lane Park need expanding. Plus, there has to be a major programme of improvements works to The Paddock, And, the focus of providing usable routes to the Lea Valley should be on improved access from the north of Down Lane Park to Tottenham Marshes better utilising the existing subways and footbridges.

7 The Friends of Down Lane Park involvement in the consultation process

7.1 This response follows on from the response sent in March 2014 as part of the earlier round of the sites allocation consultation. That response is included below. We are disappointed that the latest round of the consultation shows little indication of responding to the comments made in March 2014.

7.2 Representatives of the Friends group are willing to meet to discuss this response.