

Argles James

From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2018/2223 Site Address: Strategic Development Partnership (SDP) Sites Welbourne, North Island, Ferry Island, Ashley Road East and Ashley Road West Station Road London N17 London Comments by: Paul Burnham

From:
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Submission: Objection

Comments: We believe that the following points should be taken into account when considering this application.

ONE ¿ The quality of Council social rent dwellings in this development

Part2 of the October 2018 Addendum to the Financial Viability Assessment tells us that building standards have been reduced at Welbourne since the Council social rent tenure was introduced into the plans:

<http://www.planningservices.haringey.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=1170945>

Some of the savings shown may be because council rent homes are normally let unfurnished (with no furniture or white goods), however the other savings amount to a drastic reduction in quality standards.

Cheaper doors, cheaper wall and floor coverings, kitchens, cheaper communications (presumably meaning door entry systems), and a 14% saving on cheaper sanitary appliances (sinks, shower trays, basins and WCs):

- all of these changes have been introduced for the Council social rent homes, and none of them are acceptable.

The Welbourne block will have a larger number of children than the rest of the development. We say that robust, good quality finishes and fittings will be required; and that council tenants deserve no less.

TWO ¿ Suggestions for the management of Build to Rent housing

The market part of the development will be mostly or exclusively Build to Rent (BTR), in other words corporate private rented housing.

BTR is proposed as a tenant retention and community-building model, unlike the existing, highly transient private rented sector. However, all private renters are in a position of marked disadvantage vis-à-vis their landlords, because they have neither ownership rights nor social housing rights, and because the landlord can use no-fault Section 21 evictions.

BTR is a new and largely untried sub-tenure, and therefore some additional guarantees for tenants are appropriate.

Covenants signed by the corporate landlord could guarantee that tenancies of at least 5 years; with a covenanted protocol to provide agreed additional protections from eviction in the case of tenants falling ill or becoming unemployed, because Housing Benefit would never cover their full rent.

The risk to the landlord of this approach would be manageable, as they will have a mainly young and affluent target customer base.

We recommend that such a community-building strategy should be adopted within the Planning Obligations for this application.

THREE ¿ Inadequate Child play space, and inadequate developer contributions

On 16 October, we wrote to the Mayor of London, concerning unrealistically low child yields for new housing developments, including this one. Almost no provision seemed to be made for the children of market and intermediate residents.

Anna Turner, Senior Strategic Planner at the GLA, replied from mayor@london.gov.uk on 13 November, ref: MGLA181018-5403 to say that,

¿The Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance (September 2012) does use figures from the Wandsworth Child Yield calculator - however, the updated calculator (version 2.1) does not use this data¿. let me clarify that this calculator was updated and published on our GLA Intelligence website on the 6th of December 2017 (please click here to see this version 2.1 of the calculator).¿ This was very good news.

The Planning Sub-Committee Report for the present development para 6.8.2 states that ‘The GLA child yield calculator provides an estimate of 133 children [and young people, 0-18 years], requiring 1,330m² of play space.’

This is based on the Wandsworth Child Yield calculator - which it is recommended should no longer be used.

The developer is offering to provide on-site play space for under 5s only. This is completely inadequate.

Still using the Wandsworth Child Yield calculator, if the Council exercised its option to amend the housing tenure, and all dwellings at Welbourne became council rented, there would be 187 children requiring 1,871m² of play space. In this situation, the developer offers only an increased S106 contribution. This is also completely inadequate.

However using the GLA’s updated calculator (version 2.1) for Outer London, there would be 356 children requiring 3,560m² of play space. If all dwellings at Welbourne were to be social rented, there would be 389 children requiring 3,894m² of play space.

There needs to be adequate provision for the additional number of children and parents, with a developer contribution required for schools and additional school journeys, etc.

This scheme would not be a child-free development, instead it would be a place where families are overcrowded and where facilities are not provided, and needs are ignored.

The likely population yield of this scheme has been greatly underestimated by the developer and the Council. It is hoped that the development will not go ahead, until this issue has been resolved.

FOUR ‘ We need 50% Council social rent dwellings

The Council officers emphasise the portfolio approach, with 40% affordability across a range of Tottenham Hale sites. This however does not distinguish between different types of ‘affordable’ housing.

There are seven sites in Tottenham Hale which have planning permission, but which have not yet been built: Cannon Factory & Ashley House, One Station Square, Hale Wharf, Ashley Gardens, Berol Yard, Hale South West Plot, and Monument Way.

They include a total of 1,792 dwellings, of which the affordable component comprises 524 intermediate homes and only 156 affordable rent homes (8.7% of the total).

These latter are the only homes that can be accessed by households without savings and capital for deposits and advance payments.

Haringey's most recent housing needs survey (2013) shows that 48% of households have no saving, or are in debt.

61% of households of mixed heritage, 69% of black households, and 74% of Asian households in Haringey have no savings, or are in debt. The comparative figure is that 37% of White households have no savings, or are in debt.

The overprovision of market housing which local people cannot afford is itself a source of social exclusion, because the resultant increase in house prices and market rents drives out poorer people from the area, especially private renters.

This conflicts with paragraph 3.2.2 of Strategic Policies under the Local Plan: 'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live'.

Even the 156 affordable rent homes on the seven sites with planning permission are not affordable to many households with low and uncertain incomes, and poorer families with children. On 13 November, Haringey Council's Cabinet decided to start consultation on revising its Housing Strategy so that Social Rent rather than 'affordable rent' becomes the preferred tenure and rent regime, for general needs rented housing applicants.

Even though the Tottenham Hale Centre proposal now has some Council rent housing, and even if the council makes all properties at the Welbourne site council rent, the unaffordable 899 market and shared ownership homes would still price local people out of the area.

100% council housing at one site out of five is good, but it is not good enough.

This site is 60% council owned, and we should have council homes built on council land.

Therefore we recommend that this scheme should be rejected in its present form, and amended so that one-half of all homes on the five Tottenham Hale Centre sites become council homes at council rent.

