

Ayshe Simsek X2929

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06 November 2015

To: All Members of the Cabinet

Dear Member,

Cabinet - Tuesday, 10th November, 2015

I attach additional feedback papers from the consultation that were omitted due to a clerical error from the Adult Services Consultation Report[item 8] in Appendix 1. The papers should be consolidated with Appendix 1 and should follow from page 327 with the heading “Additional Letters and Email” pages 327 to 374.

I further attach an addendum for item 13 , Seven Sisters Regeneration, Tottenham – Compulsory Purchase Order 2016 – “London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016.This will inform the Cabinet of the changes to the compulsory purchase guidance to reflect legislative changes and case law since 2004.

The “Guidance on Compulsory purchase process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of, compulsion” (‘the Guidance’) was published by the Department for Communities and Local Government (DCLG) on 29th October 2015, which was after the date that the Cabinet Report was submitted for publication.

Yours sincerely

Ayshe Simsek X2929
Principal Committee Co-ordinator

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LATE BUSINESS SHEET

Report Title:

Corporate Plan Priority 2 - Outcome of Consultation and decision on proposals relating to adult services

Committee/Sub etc:

Cabinet

Date: 10/11/2015

Reason for lateness and reason for consideration

These are additional feedback papers from the consultation that were omitted due to clerical error from the Adult Services Consultation Report in Appendix 1. The papers should be consolidated with Appendix 1 and should follow from page 327 with the heading "Additional Letters and Email" pages 327 to 374.

Authorised by:

B. F. Taska

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The Lewis & Mary Haynes Trust: Objections to the proposed merger of the Grange and Haynes dementia day care centres and closure of the Haven day care centre.

The Trust objects to the proposed merger of the Grange with the Haynes dementia day care centre are on the grounds of:

- Insufficient capacity at the Haynes centre
- Unsatisfactory travel for clients from east of borough
- Alternative provision unlikely to be adequate replacement of day care
- Personal Budgets unlikely to cover alternative provision
- Need to meet future demand for dementia day care
- Inconsistency with National Dementia Strategy & Haringey Dementia Commissioning Strategy

Insufficient capacity at the Haynes centre

1. The Haynes Centre was designed to accommodate 20 clients [REDACTED] PCT project manager instruction to architects at day centre design meeting, 5 May 2004) This is borne out by the provision of 20 places in the dining area and the furnishing of the main space.
2. The Consultation paper refers to 40 people currently accessing the Haynes Centre, and that is correct. However, some clients come two days and others for three, and because of illness or for other reasons, only about 18 come each day.
3. Impact of merging the Grange with the Haynes: We do not have the latest take-up figures but using January 2011 figures, the combined Grange (152 place days) and Haynes (181 place days – based on 15 users at that time) will be 333 place days, or 111% of the Haynes capacity. The present take-up at the Haynes has increased with the rise in users from 15 to 18, and as a result of the closure of the Woodside Centre. Furthermore, closure of the Haven will require dementia day care for up to 27 people (EIA for Haven closure, June 2015)
4. Transfer of service users from the Grange to the Haynes – reassessment of Grange users: The Consultation paper states that the closure of the Grange would require reassessment or review of the current users with a view to identifying satisfactory alternative provision to meet the assessed needs. Because all users of the Grange and the Haynes are clinically assessed as having severe dementia, it is unlikely that further assessment will find their assessed need satisfied by a lesser provision. In addition, since the reassessment or review will be conducted “with a view to identifying satisfactory alternative provision to meet the assessed needs” there is a risk here of needs assessment criteria being adjusted to reflect the limited number of places at the Haynes.
5. Reassessment of Haynes users: Although the Consultation paper makes no reference to reassessment of present users of the Haynes Centre, the Equality Impact Assessment states: “The Haynes service users would also be subject to a re-assessment of their care and support needs.” The same considerations set out above would apply.
6. While it is certainly true that the Haynes centre, with 281 sq metres net floor space, is larger than the Grange, nearly a quarter of that (62 sm) is used for kitchens, offices, toilets etc. A further one-third (87 sm) is made up of smaller rooms used for therapeutic activities (reminiscence, art, music, library) leaving 30% (78 sm) for dining and 20% (54 sm) for the sitting area.

The Lewis & Mary Haynes Trust: Objections to the proposed merger of the Grange and Haynes dementia day care centres and closure of the Haven day care centre.

Insufficient capacity at the Haynes Centre (cont)

It is these two spaces which determine the capacity of the centre. It is not possible to expand the daily attendance at the Haynes centre while maintaining an acceptable level of care, even with extra staff. There is not sufficient space in the areas that matter.

Unsatisfactory travel for clients from east of borough

1. At both the Grange and the Haynes, most clients are picked up from their homes, using centre-based vehicles with the driver and escort drawn from the centre's staff. These clients arrive about 10.30 am and leave about 3.30 pm.
2. An important reason for opening the Haynes centre was to provide dementia day care in the west of the borough, so eliminating lengthy journeys which deterred potential beneficiaries living in the west from attending the Grange.

Closing the Grange and transferring its clients to the Haynes re-creates exactly the problem the Haynes was established to resolve.

Furthermore, the longer travel time will mean that users from the east of the borough will arrive later and spend less time at the centre, so reducing the benefit of attendance.

Alternative provision to meet need

The day care centres provide around five hours of physical, social, and emotional care and stimulation, including small group orientated therapeutic activities such as poetry and play reading, singing, games, exercise, reminiscence and craft work. The centres enable social interaction between users, which can have a therapeutic effect on their behaviour. The importance of social activities such as the dementia day care centres provide, cannot be exaggerated; they are essential to the care of people with dementia.

Use of Personal Budgets

Both the Consultation paper and the Equality Impact Assessment state: "Service users will be encouraged to use their personal budget to access any support required to meet their assessed need." It is very unlikely that any users of the Grange or Haynes will have a Personal Budget sufficient to pay for the specialised dementia care required to meet their needs or for the travel costs resulting from dispersed alternative care.

Future needs for dementia day care

The most recent data on dementia in Haringey is "Haringey's profile of dementia" published in Public Health Intelligence, May 2015 and presented at the September meeting of the Dementia Steering Group. The figures given are:

In 2013/14, there were 886 people in Haringey who had been diagnosed with dementia and an estimated 400 further cases undiagnosed, giving an approximate 1,290 people with dementia in the borough in 2013/14

The Lewis & Mary Haynes Trust: Objections to the proposed merger of the Grange and Haynes dementia day care centres and closure of the Haven day care centre.

Future needs for dementia day care (cont)

These figures are roughly the same as those in Haringey's Older People's Mental Health and Dementia Commissioning Framework 2010-2015 (NHS Haringey/ Haringey Council, January 2011).

Two points to make about these figures:

- Dementia is an incurable and progressive disease that progresses ineluctably through the stages of mild, moderate and severe. The users of the Haynes and Grove have been clinically diagnosed with severe dementia.
- Only about 40% of people with dementia receive a formal diagnosis. Successful implementation of the Haringey Dementia Commissioning Framework and the Pathway being developed by the Dementia Steering Group will lead to an increase in dementia diagnoses and a corresponding increase in need for day care facilities. This is already evident from the waiting lists for the Haynes and Grange.

It is hard to imagine that Haringey Council or the Haringey Clinical Commissioning Group will ever be in a position to open new centres to replace either the Grange or the Haven day care centres. So, in view of the inevitable increase in need, both the proposal to merge the Grange with the Haynes and the proposal to close the Haven will deprive future Haringey residents with dementia of the care they need. Looking to the future, these proposals make no sense.

Inconsistency with National Dementia Strategy & Haringey Dementia Commissioning Strategy

Haringey Adult Services has adopted the goals of the National Dementia Strategy and in its Commissioning Strategy sets out the path to achieving them. These proposals run counter to these goals.

Closure of the Haven day care centre

The Haven Day Centre provides day services for adults over 65 years old, limited to 24 people per day, providing day opportunities to 53 Haringey residents. Over 50% of service users are aged 80 years or over. All users have a physical frailty or sensory impairment and/or require support with memory and cognition conditions, i.e. dementia, possibly up to 50%, some with dementia more advanced than moderate.

Closing the Haven day centre will inevitably place more pressure on the Haynes and Grange centres.

Hornsey Pensioners Action Group (HPAG)

Response to Consultation by Haringey Council on Adult Social Care services

September 24th 2015

The text in the consultation emphasises the importance of preventative care, keeping older people well.

We agree. This is a message that our group has campaigned for over a long period. Many things help keep people well; these include low cost health services such as physiotherapy & podiatry, eating well, local facilities for exercise classes, swimming and, not least, opportunities for older people to socialise.

The provision of community health services is currently provided by the NHS, and in past representations we have noted inordinately long waits.

In Haringey, hot meals to residents is provided by recommended firms, lower charge after means-testing.

Provision of facilities for exercise and centres at which older people can meet with one another, get advice and help is a local authority responsibility. In some they were able to get a hot meal. These work well at present and it appears that this consultation wants to close some of them.

According to the stated aims, this is illogical to close them. Please keep open these centres where people get face to face attention with others.

It also appears that the closure of Osborne Grove Nursing Home is proposed.

Members of HPAG have had much involvement with the home. It cannot be verified that patients would fare better with '*re-enablement*' than by remaining in the home.

In fact there are too few residential nursing homes to aid the transition from hospital to own home in Haringey. More Intermediate care was mentioned but no plans outlined.

Do not close Osborne Grove Nursing Home.

The recommended alternative schemes that would operate as Social Enterprises could not replace the facilities proposed to be withdrawn. It is possible that such enterprises would supplement the work of the centres and nursing homes; we note that Caring Connections was appreciated when supported for a short time by Haringey Age UK.

However, it is not acceptable to out-source council responsibilities to Social Enterprises.

In general, out-sourcing requires contract definition; this cannot cover everything and guarantee good quality of service. The path of responsibility would be broken and residents deprived of council care.

If the proposal to close the centres went ahead our members and pensioners across the borough would feel bereft.

Not covered in the consultation is Communications.

For adequate delivery of Adult Social Care services a good system for communications is needed, and this is currently not the case. A resident calling on the telephone for a council service will be in for an exhausting process. There is an information spiel before any response, which is in the form of a series of choices. **The one number approach is difficult especially for older people.** When on the correct pathway there is a long wait and further information messages. Finally when through to the person dealing with the enquiry, this person is often untrained in telephone clarity, does his or her best but appears to be unsupported. There is no back up for email enquiry, and when the call ends how does one retrieve the decision made?

Assisted transport is needed.

In relation to re-enablement the consultation makes no mention about transport for older people to those places where they can socialise. We don't want older people incarcerated in their own homes. Some of our members use Dial a Ride to get to our meetings, but find that they must book way ahead. This may indicate that more assistance of this sort is needed.



On-line consultations.

Both on-line consultations included closures, so it appears that money needs to be saved to provide home-based care. Schemes are named but their remit not defined.

The Consultation on proposal 1 was for *Increasing the council's capacity to provide re-enablement and intermediate care services.*

The Consultation on proposal 2 was for *Increasing our capacity to provide suitable accommodation that promotes individual well being through expanding Supported Living Accommodation and Shared Lives schemes.*

If more information was supplied on those schemes we could comment. But we are totally against closure of existing centres and homes, and do not want council responsibilities delivered at 'arms length'.


on behalf of Hornsey Pensioners Action Group
www.hornseypensionersactiongroup.org.uk


This week on Fri 24th July the Council will be holding a consultation meeting with the carers on the future of day services for people with dementia, and on the future of the Haynes Day Care Centre. This is the only meeting offered to the carers at the Haynes. It would of course be best if we carers are informed of all the planned changes and proposals by all the providers before going to this important meeting.

Could I therefore please gently ask you if you could respond to my questions below relating to the Dementia Day Centre included in the BCF. Please provide as much explanation/ background/ info/ detail of the service as possible that's included in the BCF and how, if at all, it relates to the Haynes Day Care Centre.

Thanking you in advance,

Kind regards,



I'm the sole carer of my husband who attends the Haynes Day Care Centre for people with dementia, and also member of the Relatives Support Group there. I recently joined the Carers Reference Group set up by the Haringey Healthwatch, and as its representative attended the Dementia Steering Group last Wednesday - we were in the same room, but unfortunately I had to leave after the meeting promptly to collect my husband from his day centre much after their usual time.

I wanted to talk to you last Wed but that was not possible. Could I please seek some information from you re: the BCF. I refer to the BCF Community Event on Thursday 4th June 2015, and the presentation that you circulated the following day. I refer specifically to page 23 of the presentation "BCF Scheme & Service Overview" which summarises components of the BCF in a table format under 4 headings with indicative resources for 2015/16. Under Scheme 1: Admission Avoidance, a number of services are listed and £13.5m resources for 2015/16 is shown.

The services listed include Dementia Day Centre, as carers we would strongly agree that good dementia day care centres keep people with dementia healthy longer in the community, reduce their isolation, enhance quality of their lives, delays the need for residential care and reduces the need for hospital admissions. As carers we think that care at home does not provide such benefits and may in fact lead to isolation, lack of adequate support and default use of A&E services; carers' health and wellbeing are also effected with double impact on NHS.

Could I please ask you to give further information and explanation for the inclusion of the Dementia Day Centre on the BCF Overview table: does it refer to existing services, does it refer to such services needing to be provided and/or developed to help deliver BCF objectives, has there been any assessment of the level of need, does it reflect the major changes to dementia day care services following the recent decisions of the Council, does it take into account the increasing numbers of people with dementia, and does is it indicate some BCF funding may be available to provide dementia day centre services, etc.

Thanking you in advance,

Kind regards,



I refer to Beverley Tarka's letter dated 3 July advising carers and clients of the Haynes and Grange day centres of meetings to be held later this month and in August regarding the proposed changes to day centre services.

I should like to know whether the meeting for carers (24 July at the Haynes) will be minuted or otherwise recorded for the benefit of those who are unable to attend. Since it is described as a "focus group session" I would not expect formal minutes of the discussions. However, it is important that *everyone* is properly informed of the "to help explain what the proposals will mean for you" aspect.

I should like more information about the "advocacy experts" who will be present at the meetings, in particular their professional affiliations. Sight of their brief would also be helpful.

I also require an assurance that as many of the day centre staff as possible will be present during the meetings with clients. Hayes and Grange staff are, from the viewpoint of our loved ones, familiar and trusted individuals. These meetings may be confusing and distressing for clients and minimising such distress must be a priority.



Co-ordinator, Haynes & Grange Relatives Support Group

Cllr Kober et al.

I am writing to you to request your support in expediting the reasonable adjustment request below. HWF and the borough's DPO were not informed or invited to contribute to the consultation on Adult Social Care. Over a week ago I requested the papers and heard nothing until yesterday. I am still yet to receive any paperwork.

I have asked to receive the documents forthwith along with an extension to the deadline to enable LBH to consult with the people effected by these proposed changes and so you are not in breach of your statutory obligation and/or subject to legal challenge.

I look forward to hearing back from you shortly with a new deadline date,

[REDACTED]

Representation Worker

[REDACTED]

Post: Haringey Women's Forum,
18a Edison Road,
Haringey.
N8 8AE.

Online: Haringey's Disabled People's Organisation, Enabling Haringey, has a [webpage](#)

Reasonable Adjustment: I need information in plain English. Please use [this guidance](#)

Donate: You can help us raise funds through our [website](#), via [ebay](#) or by texting 70070 and quoting HWFA11. Don't forget to say 'yes' to gift aid.



Beverley,

Many thanks for your email.

I look forward to receiving the documents so we can consider your proposals for changes to Adult Social Care and so we are able to submit into the consultation.

Given that I am yet to receive any documents to consider and it is less than a week from your original deadline, **please confirm your new deadline in light of our reasonable adjustment request – will it be 90 days from the date that we receive the consultation documents?**

As I mentioned in my original approach over a week ago, LBH has an obligation to consult and engage people, particularly along the lines of protected characteristics (EA 2010).

HWF wishes to make sure that LBH is not in breach of its statutory obligations. Given the **delay in your response, might I suggest that you also email the accessible paperwork to [REDACTED] and [REDACTED] to enable us to disseminate it to our Board and service user groups.**

I look forward to receiving the papers and new date shortly and working more closely with LBH in the future.

[REDACTED]
Disability Representation Worker

[REDACTED]

Post: Haringey Women's Forum,
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Haringey.
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LOTTERY FUNDED



Nick,

I am getting in touch directly as I have just stumbled across the Adult Social Care consultation and need to understand what has happened around LBHs engagement, and get accessible documents speedily so that you aren't in breach of your statutory responsibilities.

Please **send me all the papers for this (these consultations) as a hard copy in plain English as a reasonable adjustment** ASAP. Address at the end of the email.

Please also **provide a new/alternative date for the end of this consultation, to enable the 90 day consultation period that LBH is committed to, to enable engagement of disabled people and women in Haringey.**

Please also clarify:

- 1) **How the EqlA were completed and which organisations** were approached to contribute the EqlA
- 2) How the consultation was **publicised; method and dates** (given that LBH has been informed numerous times that over half of disabled people in Haringey do not use the internet and therefore **relying on the internet to consult is, in and of itself, discriminatory**)
- 3) **Which VCS were approached** to respond to the consultation and **which equalities streams you considered them to be representing.**

As you know Haringey Women's Forum is the borough's women's organisation and the home of the borough's DPO so that fact that we were not informed about this consultation (given our reach and experience with women, disabled people including MHSU, BMER communities and LGBT, with particular experience around multiple marginalisation) **makes us somewhat concerned that LBH has not met its obligations around equalities or its commitments to consult.**

It is, of course, disappointing to discover a significant consultation that effects the vulnerable people you represent and work with by pure chance (via a online petition!) nearly three months in. HWF and the boroughs DPO are very keen to work with LBH to make the most of our limited capacities to ensure the most vulnerable are not disproportionately effected by austerity measures; in order to do so, however, we ask LBH to meet its statutory obligations and engage the VCS in a timely and appropriate manner.

I look forward to receiving the papers and new date shortly and working more closely with LBH in the future.



Disability Representation Worker
Monday, Wednesday and Friday



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Haringey.
N8 8AE.

Online: Haringey's Disabled People's Organisation, Enabling Haringey, has a [webpage](#)

Reasonable Adjustment: I need information in plain English. Please use [this guidance](#)

Donate: You can help us raise funds through our [website](#), via [ebay](#) or by texting 70070 and quoting HWFA11. Don't forget to say 'yes' to gift aid.



27th July 2015

Dear [REDACTED]

Can you please keep the Centre open. I hope you can please keep the Centre open and pay all the Staff some more Money to keep the centre open. Even the Hazen and Roundway also and Always and Birkbeck Road is closing. There is only one centre being left open and that is Ermine road. It is not fair for all the service users and Elderly.

I have received an invitation to a focus group at Osborne Grove Nursing Home on Wednesday 22nd July to discuss changes proposed for day services in Haringey.

As my sister is a long-term resident at Osborne Grove, I wonder whether there is any point in me attending as my sister is not in receipt of day services.

I would be grateful if you could clarify. I am eager to discuss what is happening with Osborne Grove, but I live on the South Coast near Portsmouth and do not want to come such a long way to a meeting if it is not relevant to my sister's future.

Many thanks

[REDACTED]

Haringey Adult Social Care Consultation: Proposal 3 Increasing the availability and flexibility of day opportunities within the borough meeting the individual needs of residents

The Roundway day service for adults with autism and complex needs – a report on the impact of closure

Executive Summary

The Roundway is an autism-specific day service in the London borough of Haringey. It is run by the council and provides autism-specific support to people with autism, learning disabilities and complex needs to take part in various activities, learn new skills, and to meet new people to develop their social skills. It is known locally as the 'Autistic Spectrum Service', and provides day activities, both in the Roundway building and out in the local community.

The Roundway currently supports 27 adults with autism, learning disabilities and complex needs. There are 28 members of staff supporting the 27 service users.

Haringey Council have put forward a proposal to close down the Roundway service and provide day services using a new model of social care where activities are no longer delivered from a physical building but are delivered mainly 'in the wider community'.¹

In May 2015, a survey looking at the experiences of those using the Roundway service was sent out to all parents/carers of service users and, where service users had no close family, the residential homes in which they live. The survey gathered details of people's needs and of their experiences of the support received from the Roundway day service. We received 21 completed surveys, from the 27 sent out.

The following are the key findings from the survey responses:

- Roundway staff were rated highly by all parents/carers in terms of support provided and expertise in autism and challenging behaviours/ complex needs.
- All service users had accessed new activities in the community due to the structured support from the Roundway service, many for the first time.
- The Roundway service has enabled individuals to build positive relationships and lasting friendships.
- The Roundway service provides essential respite for parents/carers – often the time their adult children spend at the Roundway is the only time parents have a break from their caring duties.
- Parents/carers overwhelmingly feel that the friendships and relationships their adult children have built with the support of Roundway staff would be lost if the service closed down and there were no consistent 'base' for their adult children to meet and build friendships and relationships.

¹ Consultation – Corporate plan priority 2 empowering all adults to live healthy, long and fulfilling lives. Consultation on proposal 3: Increase the flexibility and availability of day services within the borough p.5

Detailed below are the key findings from the survey, including direct quotes from parents/carers and residential staff. All names have been changed to maintain anonymity.

Staff expertise and the importance of consistency

“Roundway support gives daughter stability during the day, enables activities in safety with staff who are experienced and know her, and some sort of normal life for me.”

20 out of 21 respondents said that Roundway staff understood the needs of their children

17 out of 21 respondents gave staff the highest rating of having an ‘excellent understanding’ of their child’s disability

All parents responding to the survey highlighted the skills, knowledge and expertise of the staff supporting their children at the Roundway. We asked managers at the Roundway about the levels of training in autism that staff receive and were told that all staff have been trained in Autism Spectrum Disorders levels 1 and 2 SPELL (Structure, Positive, Empathy, Low arousal, Links framework). The Roundway management team have completed SPELL 4 which focusses on behavioural interventions, diagnosis and assessments. All staff have completed additional breakaway training to understand techniques to breakaway if a client is challenging towards them and to look at conflict resolutions.

Roundway staff receive regular supervision by trained members of management in Leadership and Management 4-5. The Learning Disabilities team provide Speech and Language Therapy and Occupational Therapy at Roundway for the service users. Parents and carers of service users also have the opportunity to link in with a physiologist who works alongside Roundway staff in the service in order to provide a holistic approach to care.

All service users are assessed by staff with autism experience and training to provide them with a person-centred programme of activity with identified goals and outcomes. This programme is reviewed every 16 weeks by the programme coordinator (keyworker), a member of management and the service user themselves.

The Department of Health review ‘Transforming Care’, was published in response to the abuse of people with learning disabilities and autism uncovered at Winterbourne View, and states that:

‘It is crucial that staff who work with people with challenging behaviour are properly trained in essential skills...Better skills and training are an important part of raising standards overall and we expect providers to ensure the people they employ are properly trained.’²

The Roundway staff are clearly fulfilling best practice models for working with adults with challenging behaviour, and at present Haringey Council are meeting their obligations under the ‘Transforming Care’ programme.

As Haringey Council have not put forward any clear proposals for how this complex group of service users will be safely supported to access day opportunities in the absence of the Roundway, they will be putting an already vulnerable group of adults at further risk by closing a day centre which currently meets the needs of

² Transforming Care: a national response to Winterbourne View Hospital p.39

very complex individuals. Haringey have stated that each service user will be 'reassessed' and if they still have needs that must be met, they will be given a 'personal budget'. In this situation, it is unclear what other autism-specific services or care staff would be available in the local area for parents/carers to buy in with their 'personal budget'. People with autism need to be supported by expert, well-trained, consistent staff – as they currently are at the Roundway.

This high quality of staff support, knowledge and expertise was consistently reflected in the survey responses. Our survey asked: 'do you feel Roundway staff understand your child's needs and difficulties?' Of the 21 people who answered this question, 20 of them answered 'yes' and one said they didn't know. Seventeen respondents then went on to rate the level of staff understanding of their child's disability and individual needs as 'excellent'.

The manager of a residential home where one service user lives commented:

Staff have worked with three service users for years – knowledgeable, professional, friendly. Provides safe/enjoyable outlet of services.

Complex needs and challenging behaviour

“George will be lost and very upset not to come and his head banging and slapping, hitting himself, I think will get worse. This is George’s life, he loves the Roundway and where would he go, and I can’t have two boys at home both with having no where to go, that would not be fair.”

20 out of 21 respondents said their adult children attending the Roundway have ‘challenging behaviour’

19 out of 21 respondents said Roundway staff were experienced at dealing with their child’s ‘challenging behaviour’

12 out of 21 respondents said that their child’s ‘challenging behaviour’ had decreased since attending the Roundway

The Roundway provides support for people with very complex needs. This was confirmed by 20 respondents who agreed that their adult child has challenging behaviour. We went on to ask about the frequency of this challenging behaviour: nine people said that this behaviour occurred ‘most days’, seven said it occurred ‘occasionally’ and three people reported it as happening ‘every day’. This is a significant proportion of Roundway clients who exhibit challenging behaviour on an almost daily basis and who are only able to access community activities due to having a team of autism-trained, expert staff around them, operating from a known and safe building.

The recently updated ‘Statutory guidance for Local Authorities and NHS organisations to support implementation of the Adult Autism Strategy’ sets out what local bodies should be doing to support people with complex needs and whose behaviour may challenge. The statutory guidance states that ‘behaviour others may find challenging lessens with the right support and individuals benefit from personalised care and living in the community... Services that can meet the needs of people with complex needs are essential to minimising the use of secure health settings.’³

Significantly, 12 people reported that the frequency of their child’s challenging behaviour had decreased since attending the Roundway service, highlighting the effectiveness of support strategies employed by staff at the Roundway service. This provides evidence that through the Roundway service, Haringey Council are currently meeting their responsibilities in providing the right support for individuals with some of the most complex needs and are also fulfilling their statutory duties under the Autism Act 2009. The statutory guidance published alongside the updated national Autism Strategy contains a chapter on ‘Supporting people with complex needs, whose behaviour may challenge or who may lack capacity’. This chapter highlights that good practice in supporting people with autism, learning disabilities and challenging behaviour emphasises:

³ Statutory guidance for Local Authorities and NHS organisations to support implementation of the Adult Autism Strategy p.46

- The responsibility of commissioners to ensure that services meet the needs of individuals, their families and carers
- That commissioners should ensure services can deliver a high level of support and care to people with complex needs/challenging behaviour; and
- That services/support should be provided locally where possible⁴

The Roundway service meets all of the above requirements.

The causes of challenging behaviour can be extremely difficult to understand, especially in people who have a diagnosis of autism and have only limited communication, as is the case for many of the Roundway service users. The fact that their challenging behaviour is well managed and has decreased in a significant number of service users is testament to the effectiveness of the staff, the strategies, and the service as a whole. Closing the Roundway service brings higher risks of challenging behaviour increasing and may put service users, family members and care staff at greater risk of injury or harm.

The 'Transforming Care' report also stresses the importance of local authorities providing a range of appropriate services for people with challenging behaviour, learning disabilities and/or complex needs within peoples' local area. The report reiterates the responsibility of local commissioners to commission local services which provide expert staff and safe environments for people with these very complex needs, and that they must work with local people using these services when looking at this type of provision in the community:

'Social care and health commissioners will be accountable to local populations and will be expected to demonstrate that they have involved users of care and their families in planning and commissioning appropriate local services to meet the needs of people with challenging behaviour. Families and self-advocates have an important role to play in challenging local agencies to ensure that people have local services and the optimum model of care.'⁵

Haringey documents state that they want all individuals to lead fulfilling lives where choice and control allow them to access the community just as anyone else does. They state in their latest consultation document:

'All people with learning disabilities have the right to lead their lives like any others, with the same opportunities and responsibilities. The shift from buildings based care to community led support will enable all adults to make informed choices to enable the best outcome for them.'⁶

It is concerning that there is no evidence given to show how a move away from buildings based community provision will lead to people with learning disabilities and autism making more informed choices and having access to more appropriate care – particularly if the staff who know and understand these service users are no longer there to support them to make choices.

The nature of autism, learning disabilities and conditions where there are complex needs and significant challenging behaviours present, dictate that in order for choice and accessibility to be exercised, certain other factors and structured support networks have to be in place to enable people to do this meaningfully. Such factors include trained staff in autism and complex needs, a predictable environment where individuals feel calm and safe, and specialist communication strategies.

⁴ Statutory guidance for Local Authorities and NHS organisations to support implementation of the Adult Autism Strategy p49-50

⁵ Transforming Care: a national response to Winterbourne View Hospital p.28

⁶ Consultation – Corporate plan priority 2 empowering all adults to live healthy, long and fulfilling lives. Consultation on proposal 3: Increase the flexibility and availability of day services within the borough

Accessing the community, socialising and maintaining relationships

“My daughter has attended services for over 20 years, all original users are good friends, stressed if don’t see each other (eg. Away because ill).”

All 21 respondents said their adult children have difficulty going to new or unknown places

20 out of 21 respondents said their child had been supported by the Roundway staff to go to new places or try new activities

5 out of 21 respondents said their child would have no contact with people outside their immediate family if they stopped going to the Roundway

10 out of 21 respondents said their child would have very little contact with people outside their immediate family if they stopped going to the Roundway

5 out of 21 respondents said their child would have occasional contact with people outside their immediate family if they stopped going to the Roundway

Our survey asked respondents if their child has difficulty going to new or unknown places, to which all 21 answered ‘yes’. We then asked how frequently their children have difficulty going to new places to which 11 responded that their children ‘often’ have difficulty with this and a further nine people said their children ‘sometimes’ have difficulty going to new or unknown places. One person said that their child only ‘rarely’ experiences problems with this.

Despite high levels of difficulty with accessing the community, all respondents agreed that the Roundway staff have enabled and successfully supported their children to go to new places, 13 of whom said their adult children now go out to new places ‘regularly’.

Due to the nature of autism, building relationships and friendships and interacting with people outside immediate family, can be immensely difficult. People with autism are particularly vulnerable to social isolation. In 2012 the NAS conducted research which found that 66% of adults with autism describe their main friends as their family or carer. Friendship and social interactions become even more of a struggle for those who also have a learning disability, with one third of this group reporting that they have no friends at all.⁷

Of those who responded to our survey, 17 service users have a diagnosis of Autism and Learning Disability, putting the majority of these Roundway attendees into the category of people who potentially have significantly lower contact with anyone outside their immediate family or carers. Bearing in mind the

⁷ (Bancroft et al (2012). The way we are: autism in 2012. London: The National Autistic Society.)

difficulties this group of people usually has with social interaction and friendships, 20 people reported that the Roundway service had helped their child to meet new people and build positive relationships with people outside their immediate family.

We also asked if their adult children had positive relationships or social contact with other people before attending the Roundway service, to which 10 said 'no' and eight said 'yes'. The following comment was made by a mother in relation to her daughter's progress in this area:

'Since my daughter went to Roundway she has made friends, knows them by name'.

What is concerning however, is that 10 respondents said that their adult children would have only 'very little' contact with people outside their immediate family/carer if they no longer attended the Roundway service. Five respondents said their children would have 'no' social contact with others if they no longer attended the Roundway and five said that their child would only have 'occasional' contact with people outside their immediate family/ carers if they were no longer able to attend the Roundway service. One person did not answer this question.

The Roundway service currently fulfils the statutory duty on local authorities, NHS bodies and NHS Foundation Trusts to:

'consider how to promote the article 8 right to family life for people with autism, including opportunities for friendships and family contact, to a life in the community where possible, and the opportunity to develop and maintain relationships.'⁸

Haringey Council will be at risk of no longer fulfilling this duty if they decide to proceed with the closure of the Roundway service.

⁸ Statutory guidance for Local Authorities and NHS organisations to support implementation of the Adult Autism Strategy p.48

End of buildings based provision and the impact of closure

“Roundway provides safe, reliable service that son looks forward to attending every day. Collected most mornings by escort who he’s worked with for years. Routine and stability crucial with additional mental health needs / wellbeing. Having structured day leaves him happy/ fulfilled – all I could want.”

20 out of 21 respondents said that it would affect their child ‘very badly’ if they could no longer attend the Roundway service

Without clear alternative proposals from Haringey Council detailing exactly how Roundway clients will continue to access day opportunities, it is impossible to know how people with such complex needs will be served by the new model of social care. The only details given so far about how day services will be delivered once the Roundway service has shut down include a statement that: ‘Service users will be encouraged to use Personal Budgets to access any support required to meet assessed need.’⁹

Even if service users are reassessed and given personal budgets to access support, to our knowledge, there is no other appropriate, local, autism-specific service for individuals with this level of complex needs to spend their personal budgets on. Currently, the Roundway fulfils the specification for appropriate day services for people with complex and challenging needs who have an autism spectrum disorder. Closing the Roundway service would take away the only existing local service appropriate to this group of adults with autism and very complex needs, and Haringey Council will be at serious risk of failing to meet their duty to provide local services for this group under the Care Act, 2014.

Our survey asked parents, carers and residential staff ‘How do you think it would affect your child if they could no longer go to the Roundway service?’ Twenty out of 21 respondents answered that this would affect their child ‘very badly’. We also provided space for respondents to add any comments about the impact on their child of the Roundway service shutting down. One residential staff manager stated:

“Stan needs time out of home and away from people he lives with, supported by staff who understand his needs. Also needs activities which enable him to develop existing skills to socialise/ explore the community/ exercise / mental stimulation – Roundway delivers this.”

A family member of another service user said:

“Service understands individual needs, encouraging him to get involved in activities. Doesn’t like change and takes long time to get used to new people and be mentally stable – closing would be absolutely devastating, cause him depression and anxiety.”

⁹ Consultation – Corporate plan priority 2 empowering all adults to live healthy, long and fulfilling lives. Consultation on proposal 3: Increase the flexibility and availability of day services within the borough p. 6.

Original proposals from Haringey Council state that: ‘As part of our transformation of social care we will end the use of buildings based care for all customers living in residential care or supported living settings.’¹⁰

This seems to indicate that those in residential care currently accessing the Roundway day service will be the first to have their activities and level of support cut. The expectation is that the residential or supported living service where they reside will now provide day activities. It is unclear how far Haringey Council have informed residential and supported living institutions that they will now be required to provide day opportunities or the extent to which the Council have liaised with residential providers about whether they have appropriate levels of staffing and funding to enable them to provide day opportunities. Haringey Council have stated that: ‘we will work with residential and supported living providers so that adults, in particular, those with 24 hours residential support, will be supported to directly access alternative services in the community.’¹¹

It remains unclear whether residential placements have the budget and/or staff to support their clients out in the community or what these ‘alternative services in the community’ are. Supporting people within residential settings is quite different from supporting people out in the community and staff will require different skill-sets to support people in this way. They will need autism training and expertise and will need experience at supporting people with complex needs and challenging behaviours to carry out activities in the community. Many people who use the Roundway will need more than one support worker to take them out into the community safely. Ten of the 21 respondents to our survey said that their adult child needs more than one-to-one support.

Currently, the Roundway service and building is a place that provides a safe and supportive space for people with autism and complex needs to spend time with their peers and to build and maintain friendships. The loss of the building and of the dedicated team of staff who run the Roundway, will undoubtedly lead to a loss of friendships, relationships, and contact with others that these clients currently cannot access anywhere else. A key difficulty for people with autism and complex needs is communicating and socialising with others. It takes extremely knowledgeable and expert support staff to enable people with autism and complex needs to build relationships. This is a skillset that comes from many years of working with people with autism. It can take months and sometimes years, for people to understand and recognise how an individual with autism communicates their feelings, wishes and likes and dislikes. In the same way, it can take many months or years of intensive work with one individual with autism to understand the causes and triggers for their challenging behaviour.

Many of the staff at the Roundway have worked with the same service users for years – staff have moved from different day services along with their clients, and even with a trusted member of staff supporting them through these previous transitions, many of the service users have experienced extreme distress at changes to services over the years. Parents told us that these transition periods have been marked by increased challenging behaviours and self-harming.

Change poses huge difficulties for people with autism, learning disabilities and complex needs. Trusted and experienced staff have previously been there to ease clients’ anxiety and to put in place strategies to help

¹⁰ Corporate Priority 2 – Savings, New pathways for people with learning disabilities – day opportunities, Haringey Council papers.

¹¹ Consultation – Corporate plan priority 2 empowering all adults to live healthy, long and fulfilling lives. Consultation on proposal 3: Increase the flexibility and availability of day services within the borough p.6

them to adapt to new environments and people. Parents and staff have expressed extreme concern about the impact that the closure of the Roundway would have on service users. It will not just be the immediate loss of the building, the staff and their friends that will have a negative impact on service users, but it will be compounded by the fact that there is no safe alternative being proposed to replace the service. The consequences will also be felt by parents/carers and family members who, along with the service users, are often the most frequent recipients of 'challenging behaviour'. Such a huge loss – of staff, friends, routine, and a trusted environment – is likely to lead to a rapid increase in challenging behaviours which, in turn, could lead to parents/carers and others' safety being put at risk. Physical health will be negatively impacted by self-injurious behaviours and many parents have reported a rapid decline in their children's mental health when they have faced major changes previously. All of this will impact on other services such as mental health and crisis teams, and will put service users in danger of being admitted to the very institutions which provisions like the Roundway, are designed to keep them out of.

Listening to parents/carers/ professionals feedback

“My daughter moved from Central to the Roundway which I was informed was an autism specific service. My daughter enjoys attending the service and they encourage her to attend college although this has not happened yet she has the option to pursue this if she wants. It would be a terrible loss if the service were to close.”

The message from parents and carers is clear: do not close the Roundway service. It is a highly valued and excellent service. Haringey Council have a duty to listen to the opinions and wishes of these parents/carers and to act on these wishes.

The statutory guidance published to support the National Autism Strategy states that local authorities have to: ‘Using a variety of methods, listen carefully to the views, feelings and beliefs of people including those with autism and their carers’.¹²

During a consultation by Haringey Council earlier in 2015, service users, carers and parents overwhelmingly responded to say that the day services provided invaluable support and respite. Haringey Council nevertheless voted through proposals to shut the day centres, even though it was the closure of day services which garnered the most responses to the consultation. As stated by the statutory guidance, local authorities must listen and respond accordingly to the views and feelings of people with autism and their families and carers, and we urge Haringey Council to fulfil their statutory duties by listening to and acting on the feedback received from parents/carers, service users and professionals.

When Haringey Council submitted their Autism Strategy Self-Assessment form in March 2015, reporting on their progress on achieving the requirements of the Autism Act and Adult Autism Strategy, the adult social care department included an example of good practice to demonstrate how they were enabling people with autism to access good quality autism services. The example they included in their self-assessment came from a person with autism who attends the Roundway day service.

It is significant that in order to demonstrate how Haringey Council are meeting the requirements of the Autism Strategy, they themselves recognised and shared an example of a service user from the Roundway service. This individual is clearly receiving high quality, expert, appropriate care and support from a day service tailored specifically to the needs of people with autism, learning disabilities, challenging behaviour and complex needs. Haringey were rightly proud of this – using it as their sole example of good practice in their self-assessment submission.

¹² Statutory guidance for Local Authorities and NHS organisations to support implementation of the Adult Autism Strategy p.33

Below is the full case study which has been taken from Haringey Council's March 2015 self-assessment submission:

I am a 28 year old female with Autism and currently attend The Autistic Spectrum Service 5 days a week. I choose to be non verbal but like people to speak verbally to me and I will give you a written response. I can sign and understand Makaton but would rather you talk to me.

I used to go to Central Day service but with all the changes in September 2013 I moved to The Roundway.

When I found out I was going to have to move I was a bit unsure of what it would be like but staff were good at reassuring me and keeping me informed.

I was happy to know that all my friends and staff that I knew was coming with me.

I had my own social story with pictures of staff, the buildings and other service users. Staff went through this with me everyday. We went for weekly visits to The Roundway for tea and biscuits and tried some sessions there. It felt good to be part of the changes and to always know what was going on.

Since the move I now get to go out a lot more and have more choice of what I want to do. I always like to know what I am doing. Staff ask me where I want to go and what I want to do, they listen to me and are very helpful. Even when I want to do something that is not always possible straight away staff explain why and when I will be able to so.

Having the same staff is important and makes me feel safe and happy to tell them what I want and how I feel.

I now have my own personal weekly programme which I really like as I know what I am doing and feel in control. I am now going out on trains, visiting places of interest to me, playing snooker, going to the gym and swimming, cycling, baking; sewing, candle making and next week will be starting Football and Boxing. I can now also use the I-pad by asking whenever I like which makes me understand things and allows me to look at interesting things of my choice.

I am very happy at The Roundway, I do a lot more of what I choose and help out with others too. If I didn't come to Roundway I wouldn't do anything.

Conclusion

Our survey results provide concrete evidence of an excellent day service which is working well for adults in Haringey with autism and complex and challenging needs. This group of service users are some of the most vulnerable adults in the community who require good quality, consistent care, which they are currently receiving at the Roundway, and must continue to receive at the same level.

Haringey Council must acknowledge that the people who attend the Roundway have enduring, complex and lifelong disabilities which require ongoing high level support. The nature of their disabilities mean that they will require substantial, expert, specialist and consistent support throughout their lives in order to make choices, to build and maintain relationships, to go outside their home environment, and to access the types of community activities those without disabilities take for granted.

The negative impact of closing the Roundway on the lives of these individuals and their families will be considerable and numerous, and will take away the only meaningful relationships they have outside of their immediate family. The staff, their autism expertise, the safe and specially adapted environment of the Roundway building, and having a team of skilled care workers around the service users, are key to this group's success in achieving the outcomes as set out in their care and support plans.

All the parents who responded to our survey were strongly opposed to the closure of the Roundway service, and were extremely concerned about what the future would hold for them and their adult children if the service were closed. Parents made it clear that their children have been through many different services, and been supported in different ways over the years but that the Roundway service was by far the most appropriate and successful support their children had ever received.

The Roundway service mirrors day services run by the NAS, where individuals have personalised activity plans, and activities are accessed from a known and safe building, staffed by a team of care workers trained in autism. Due to the nature of autism, a team around the individual is essential. No detailed alternative proposals have been put forward by Haringey Council which come anywhere near to providing the support and services which are needed by those who currently attend the Roundway. Moving service users to the Ermine Road day service is not an appropriate alternative. Plans to turn it into a social enterprise mean that the staffing and running of it could potentially look vastly different from its current form. There is no guarantee that staff will be trained or experienced in supporting individuals with autism and complex needs. It is a day service which will continue to serve an extremely wide range of disabilities and placing people with autism and challenging behaviour amongst many other service users poses significant safeguarding risks for both the individuals coming from the Roundway, and other service users accessing Ermine Road. Many parents whose adult children used to attend the Ermine Road day service told us that it was previously deemed as inappropriate and unsafe for autistic service users, making Haringey's plans to move current Roundway service users back to Ermine Road extremely worrying.

If proposals are taken forward to close the Roundway service, those individuals currently attending the service will undoubtedly experience huge anxiety and distress. We have been told that due to the uncertainty around the day centre's future, challenging and self-injurious behaviours have already increased in recent months.

Under the Care Act and the Autism Act, Haringey Council have a duty to provide appropriate and good quality day services for this group of vulnerable service users who have been assessed as having care and support needs that must be met. The NAS believes that in removing the Roundway day service, the Council would be seriously risking not meeting these statutory duties.

Haringey Council's current proposal to close down the Roundway service places an unacceptably high risk on the mental and physical health of these autistic adults, on their overall wellbeing, and on their ability to access their local community in a safe and appropriate way. The National Autistic Society strongly recommends that this excellent day service remains open.

Recommendations:

- The evidence here clearly shows that the Roundway day service should not be shut down. It is a highly valued and effective service which delivers the outcomes of increased wellbeing, building relationships, accessing the community, and a reduction in challenging behaviours for a group of people with very complex needs for which specialist knowledge and skills are a necessity.
- In order to, most effectively, fulfil its statutory obligations under the Autism and Care Acts to provide local, good quality services for people with autism and complex needs, Haringey Council should keep the Roundway day service open.
- Parents of adults who attend the Roundway service do not want the service to close. Haringey proposals for day services must reflect and incorporate the views, wishes and priorities of people with autism, learning disabilities and complex needs and their parents, carers, family members, and professionals working closely to support them, and we urge the Council to take on board the strong views from parents to retain the Roundway service.

September 2015

For more details please contact Anna Nicholson at anna.nicholson@nas.org.uk

From: "[REDACTED]" >

Date: Wednesday, 30 September 2015 02:58:15

Subject: Fwd: CHANGES TO HARINGEY'S ADULT SERVICES - EXECUTIVE SUMMARY

To: "Cllr Morton Peter" <Peter.Morton@haringey.gov.uk>

Cc: "Catherine West" <catherine.west.mp@parliament.uk>, ", " <Lynne@LynneFeatherstone.org>, "Cllr Bob Hare" <reply@haringeylibdems.org>, [REDACTED] "Edwards Dionne" <Dionne.Edwards@haringey.gov.uk>, "Hunte Eugenie" <Eugenie.Hunte@haringey.gov.uk>

Hello Peter

Perhaps you have not yet returned from holiday? But I am concerned that I have not yet had any acknowledgement or reply to my note to you dated 25 th September (copied below) especially since the consultative period regarding the Cabinet's proposals to change the delivery of services to Haringey's Adult Services ends tomorrow 30.09.2015.

My beloved husband [REDACTED] died [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] friend and mentor of so many, fell victim to the cruel, progressive and incurable Disease that is no respecter of persons - the vast majority of whom are cared for 24/7 365 days and nights (f,o,c.) by families and partners who - at considerable personal sacrifice - nevertheless take full responsibility for their stricken loved ones and devote themselves wholeheartedly to their care, well-being and quality of life. With all the "talk talk" of spreading resources more widely throughout the Borough there seems little or no real understanding of the NEEDS of both the patients now attending the HAYNES

- some 12 in number - or indeed of those throughout the Borough of Haringey who face CLOSURE or the privatisation/outsourcing of the services (already means tested) which in turn will NOT be neighbourhood based but amalgamated to serve the Borough as a whole, with all the attendant problems of transporting such disoriented, confused and very sick patients from all over the Borough to an unfamiliar neighbourhood staffed by persons (recruited by private enterprises run by for profit outsourced agencies) who take the jobs on offer because the wage they are paid just about covers their basic living costs. The present patients at the Haynes have formed PERSONALLY very close, trusting and significant relationships with the present staff and support workers all of whom without exception have a sense of commitment and vocation to their patients/clients/members. Anyone who has the slightest inkling of the nature of these devastating, incurable and progressive Diseases will know that those so condemned to live out the "life" that may remain for them here on earth ..for weeks, months, years or even decades ..that secure. FAMILIAR surroundings, amongst peers and support staff and with consistent, flexible but "steadfast" management true to its mission statement and agreed terms of reference, remit and job descriptions etc ARE MANDATORY.

My beloved husband (and I his registered full time carer) benefitted immeasurably from the few months that he attended the Centre (September 2014 - July 2015) The Centre provided not only social contact with [REDACTED] peers and REGULAR trusted support workers but also gave me his registered carer 24/7 365 days and nights a year a few hours to deal with the many other demands which I must meet,

I realise that protests of this kind are routinely ignored, brushed aside or stacked away with other unopened post, that little or no reference made to them as a whole ..("a huge response to which we cannot respond individually" let alone personally etc ... all part of the pantomime of make believe - a choreographed display of smoke and mirrors.. But I hope - perhaps in vain - that some small particle from this large chunk of impassioned personal protest may alight on the body politic and penetrate the thick skin of statistical data and the imperative to adhere to the principle of "cost effectiveness" (often illusory in actual practice). As one who is regarded as a self funder and taxpayer my comments are NOT motivated by self- interest and pecuniary advantage - I make these comments in the avowed belief that many of the proposals outlined in this latest consultative 'exercise' are ill conceived and potentially damaging - adding to the sense of confusion, fear, anxieties and discomfort to which these most vulnerable, frail and otherwise inarticulate of INDIVIDUAL PERSONS ARE ALREADY subject.

Peter, I am presently very poorly - probably because I have had little sleep during my beloved's last months of "life" wracked with the relentlessly cruel progression of symptoms that have no cure. And, as you will know, I shall myself be much preoccupied with all the responsibilities that now fall to me as widow. matriarch, executor, trustee, director, householder, taxpayer and Her Majesty's subject to discharge. I suffer from a progressive neurological condition that has become much more bothersome (with attendant severe pain) in the past year or so, most especially since June 2014 from which time I have suffered increasing pain, weakness and extreme fatigue. I cannot now contemplate further "action", meetings, discussions or even light gardening to tend our late daughter's last resting place etc whilst so unwell. Please Peter may I ask you to peruse this present message very thoroughly and to represent my views to the Cabinet as forcefully as your own terms of reference and remit allow.

I am now making arrangements for my [REDACTED] Memorial Service. This will take place at the end of October /very early November 2015 in the beautiful [REDACTED] and will be followed by a reception for [REDACTED] (and my) family, friends and colleagues from all over the world. You, Peter, are warmly invited to attend the ceremony and reception should you or others from the LA like to attend. Full details will be published in the national newspapers and on the Internet.

The very best of good wishes in all your deliberations. Please communicate by email/Royal Mail - I cannot always reach theb'phone in time to answer it!

[REDACTED]

[REDACTED]

Begin forwarded message:

From: [REDACTED]
Date: 25 September 2015 03:41:48 BST
To: Cllr Morton Peter <Peter.Morton@haringey.gov.uk>
Cc: "WEST, Catherine" <catherine.west.mp@parliament.uk>, Lynne Featherstone <Lynne@LynneFeatherstone.org>, Cllr Bob Hare <reply@haringeylibdems.org>
Subject: CHANGES TO HARINGEY'S ADULT SERVICES - EXECUTIVE SUMMARY
Reply-To: [REDACTED]

Dear Peter

I do hope that you and your lady wife enjoyed your holiday in Kentucky. I expect you have come back to a desk piled high, your inbox filled and overflowing, voicemail jammed and so forth. I believe you urged me to be in touch on your return to continue our discussions about some issues which concern me (and you/your Cabinet colleagues) greatly, I hoped we might meet up before the consultative period came to an end on 30.09.2015.

I am deeply grieved to tell you that my husband died on [REDACTED] - we have been married for 60+ years, (SEE ATTACHMENT BELOW) My dearly beloved [REDACTED] attended the HAYNES CENTRE twice a week. We are "self funders" and are not entitled to any LA social or outsourced services. [REDACTED]

[REDACTED] - was diagnosed with Vascular dementia, Alzheimer's, prostate cancer four or five years ago. These cruel and relentless Diseases are no respecter of persons, devastating the lives and very *personae* of those they claim. Those who care for loved ones thus afflicted 24/7 for 365 days and nights, are often lauded but seldom supported in any meaningful or practical way, become cut off and alone, housebound - confined within the same 4 walls... close friends, neighbours, family members, colleagues and visitors tend to keep away, uncertain as to how handle the situation. [REDACTED] the linguist and world traveller suffered from dysphasia & dysphagia - a source of great frustration, and the many other depredations caused by these ruthless Diseases. Their insidious progressive nature can virtually entrap *the persona* within the outer physical shell.

THE CABINET MUST BE MADE FULLY AWARE OF THE CONSEQUENCES OF SPREADING THE RESOURCES AND CAPITAL INVESTMENT DONATED BY THE LATE HAYNES SISTERS THROUGHOUT THE BOROUGH OF HARINGEY - THUS DEPRIVING THE PRESENT INCUMBENTS OF THE HAYNES .. THE FAMILIAR SURROUNDINGS, THE SPECIAL FRIENDSHIPS, THE INTIMATE AND TRUST ENGENDERED BY THE VERY SPECIAL RELATIONSHIP THAT HAS BEEN BUILT UP OVER MONTHS/YEARS with the present dedicated staff .. **THIS 'CUT' is surely the unkindest cut of all - one that no transfusion of "outsourced" staff or private/charitable agency can possibly stem the haemorrhaging wounds to the ethos, mission statement and present management of the Haynes Centre, nor assuage the anguish, confusion, anxiety and fear of those to whom the Haynes, its management and staff represent the very centre of their lives, their identity as SOCIAL beings ..a haven of safety and warm understanding. I KNOW THAT MY DEARLY LOVED HUSBAND WHO DIED [REDACTED]**

██████████ - a very cruel and lingering death - preceded by years of suffering from Diseases that destroyed his very core - would not only miss his few hours a week in the company of his peers in familiar surroundings and with the devoted care and compassionate understanding of the present Management and staff - but that such a LOSS would annihilate the already rapidly diminishing quality of his life and even exacerbate the suffering that blighted his last remaining years.

I attach a notice about the arrangements for ██████████ funeral. Should your many other commitments allow, you are of course warmly invited to be with ██████████ family, friends, carers and the many others who mourn his passing. See below.

I am somewhat concerned that you and I have not yet resumed our discussions, and 30th September looms! As you will understand I cannot just now turn my mind to other matters - the grief is unbearable, the loss immense. But I do feel very strongly about many of the "cost cutting" ploys being "considered" by the Cabinet and Civil Servants especially in the light of the fact that Haringey appears to be so profligate with taxpayers' money in so many other respects. What **services** does the local authority now provide directly - so many of these services are outsourced or commissioned by the Cabinet - meanwhile the authority spends vast sums of money "upgrading", "reforming", transforming... state of the art technology that often turns out to be not fit for purpose, the use of robots and automated systems that effectively BLOCK meaningful personal intercommunication between the residents/ taxpayers and the **Authority** - the world wide web is of course here to stay, bringing many many benefits to our globalised world; nonetheless the constant drone advising residents to 'GO ON LINE' means that the elderly, vulnerable, technologically illiterate and persons who cannot afford to invest in the latest technology are "shut out" - becoming ever more disadvantaged, disassociated from the main stream.

Surely it is to these PERSONS that the LA owe a duty of care - not those well connected, articulate, well heeled, well fed **apparatchiks ensconced comfortably in positions of power - becoming ever more remote and no longer directly answerable to those who "elected" them to represent them. My beloved husband was born just after the ██████████.**

After World War II he was destined never to see his family or homeland again. He was grievously wounded, condemned to death personally by Hitler and then by Stalin, narrowly escaping certain death on many occasions, tortured, forced labour, concentration camps.. he was the sole survivor of his generation - he was granted political asylum in Great Britain - but was looked upon as an Alien with no means of subsistence.. as a physicist and mathematician of some eminence he was considered overqualified for any job on offer at that time. King George VI provided him with a demob suit but he had but ten shillings in his pocket (50 pence) between him and destitution/starvation. Despite the challenges and vicissitudes he had to overcome, ██████████ was naturalised British in the late 1950s - and gradually extricated himself from the horrendous consequences of war, pestilence and disease - by his own efforts and initiative - contributing substantially to the British way of life, upholding its established values - not only paying his way but those of others, of the community as a whole as a taxpayer and

as Her Majesty's loyal subject. Nonetheless I am appalled by the remarks that have gratuitously been made to me in recent years by some of those in the caring professions to the effect that 'it is a waste of public resources to help/support those who are non-rehabitable, incurably ill and doomed to die .. victims of unpredictable yet progressively

lethal Disease - the largest percentage of whom are cared for 24/7 365 days and nights a year by devoted family carers - at no cost to the State. I am frankly totally dismayed by many of the

proposals being 'considered' by the Cabinet - after several years of indecision and delay - that will undoubtedly do profound damage to those presently attending the Haynes Centre (including those who fund their own care and pay for the services provided by the Social Services/outs sourced agencies in Haringey) but also to the present management and staff of the HAYNES centre who have worked with a devotion and compassionate concern that surpasses all material considerations or personal self-interest.

I apologise for this rant ... but I feel a passionate concyyern about the increasing tendency to dehumanise PERSONS, subsuming them to the rule of robots - who are programmed by a faceless authority -

My kind personal regards - I appreciate your interest in my views - despite your suspicion that I am a dinosaur who cannot accept change/progress and is therefore doomed to extinction. I assure you that such suspicion is not warranted.. although I have observed that when the figure 80, 90 or even 70 is noted, the vast majority of professionals and even the general public, neither listen to nor respect the integrity of the long-lived oldie, indeed we are ignored, brushed aside - talked over our heads (the does she take sugar syndrome!) - treated as non-persons much like the robots who are programmed to react appropriately at the touch of a button, - or obliged to get into a one size fits all standardised 'uniform' and pushed onto a conveyor belt as just another anonymous package, to be processed. checked out and despatched....

PLEASE COMMUNICATE BY EMAIL. I AM SOMEWHAT DISABLED AND OFTEN CANNOT REACH THE PHONE IN TIME TO ANSWER IT!!

From: [REDACTED]
Sent: 25 August 2015 05:10
To: Cllr Morton Peter
Cc: WEST , Catherine; Lynne Featherstone
Subject: Re: CHANGES TO HARINGEY'S ADULT SERVICES - EXECUTIVE SUMMARY
Importance: High

Dear Peter [if I may - my first name is ██████ .. ██████ - more formally (and rarely used nowadays)]

I thank you for your sensitive and understanding note 22.08.2015. I find many of the comments you make, personally very touching. Your fulsome apology for the delay in responding to my e-message 4.08.2015 is appreciated. Of course, I DO UNDERSTAND the glitches that occur (perhaps too often?!) in these days of 'instant communication' in a globalised world, having - like us all - experienced such!

My husband [REDACTED], - although very frail and weak - is to be discharged tomorrow [REDACTED] from the Whittington Hospital.

He will need round the clock 24/7 nursing care which I am arranging privately. It will probably take a few days for [REDACTED] to settle back home and for us to assess how best to meet the growing demands that the relentlessly progressive and incurable nature of these devastating diseases impose.

It is very thoughtful of you to give me such a wide range of the possible dates that you are able to visit.

Very tentatively, may I suggest you pop by on Tuesday 1st September - after 5.30 p.m.? I much appreciate the opportunity to discuss these issues with you personally - as you rightly observe, these *tête-à-tête* are often more enlightening and informative than the 'feedback'

elicited 'at arm's length' by questionnaires, surveys or at public meetings. Whilst acknowledging the imperative to observe and respect each person's right to privacy and anonymity, I do believe the outspoken views of those who choose to disclose them openly are probably more "real and authentic" than those gleaned from the 'answers' to questionnaires circulated *en masse*

and specifically designed to facilitate subsequent statistical analysis and amorphous, generalised reports that meld the individual, disparate and diverse into a generalised survey punctuated by percentages, equations and logarithms, devoid of genuine, credible

and independent ideation.

I have also been in touch with our newly elected MP for Hornsey and Wood Green, Catherine West. I am convinced that the proposals presently under consideration are of crucial importance - not only to those described as this local authority's "service users" but also, nationally, to each and every resident, parliamentary constituent, taxpayer and democratically elected representative. I am attaching copies of a recent exchange of messages between Catherine and me. I am hoping very much that she may also become personally engaged in the ongoing consultative process, perhaps finding the time to "touch base" with you, Peter, if indeed she has not already done so. You will note the tone of her P.A's response to my correspondence on Catherine's behalf.

I look forward very much to your visit to our home - presently undergoing complete renovation, structural repairs and alteration as well as the refurbishment and renovation of our rather dilapidated and "not fit for purpose" domestic arrangements; we have lived here for more than half a century, the house itself having been built in 1901. At present our family home is enveloped in scaffolding, the front garden is a builders' yard (pro tem) and we are camping out in the drawing and dining rooms on the ground floor because the rest of the house has been gutted. Most of our furniture and personal effects are presently in storage .. but we can offer you a chair, some light refreshment and a very warm welcome.

In the meantime, I await my husband's return home; we owe a debt of gratitude to the paramedics, doctors, nurses and support staff at the Whittington - [REDACTED] would most certainly have died had he not been admitted to hospital urgently on Saturday 14th August. Now it seems that the sepsis and delirium have been brought under control - although of course he is very poorly and weak - BUT he will be back home again, in the familiar surroundings in which he has lived for more than half a century.

Should something "untoward" should happen to prevent your visit on Tuesday next, I shall try to telephone you on Bank Holiday Monday to forewarn you; alternatively, if convenient, you might

telephone me before setting out to visit us on the Tuesday just to make sure that we are still here and awaiting your arrival!

Best of good wishes and thank you again for your empathy and understanding,

██████████

██████████

████████████████████

██████████ (voice mail most of the time so email is best!)

Dear Catherine

Thank you for asking your lieutenant ████████ to acknowledge my electronic missive (NOT missile!) that finally sped its way to its intended target ..in the wee small hours of this morning! OF COURSE I appreciate the massive volume of messages that choke in-boxes to overflowing - much of it spam or unsolicited, irrelevant advertorial "guff" that not only wastes valuable space and time but also sometimes obliges the intended recipient to switch off entirely or to delegate the humanly impossible task of sorting, acknowledging, collating, keeping records, analysing, indexing and "inputting" the updated material onto computerised database to robots. I have myself been forced to divert the floods that inundate my mail box .. Today, for instance, there were no less than 579 automated, unsolicited and irrelevant electronic "communications" .. on a par with the extremely irritating "nuisance" and often dangerously intrusive telephone calls, text and voice mails. I have heard that MAYBE a more stringently enforced monitoring system may be introduced to dissuade these unwelcome interlopers from wantonly invading the privacy

and integrity of one's home - telephoning at all hours of the day and night - usually from outsourced call centres located abroad. Until I made stringent protest, some Banks and other large commercial organisations, introduced an automated tracking system to monitor any unusual or suspect transactions made on line. Crowds of computers were lined up in UNMANNED locations throughout the globalised world, their automated telescopic lenses pointed at the sky, searching for "fraudulent" transactions. But these robots are given minimal instructions based on electronically stored data, replete with numbers, passwords etc BUT zilch information or clue as to the true identity of the PERSON making the transaction. Thus a train of automated knee jerk robot-reactions are generated.. Unstoppable by Human hand or brain. This means that longstanding customers with impeccable records routinely receive an automated call from a robot which cannot even recognise or speak your name.. Monotonously intoning a gibberish announcement/statement that Fraud may have been committed ... And urgent action must be taken .. These calls are often made early in the morning .. Before 7 or 8 a.m. The Internet is limitless and cannot be managed or policed.. But my point is that ROBOTS are not our Masters but our servants. They can only operate as we instruct them to do. I believe that HUMAN input should retain CONTROL of the technology and TWEAK the glitches that inevitably occur when our robots go it alone,

Catherine, I have already indicated in my last L o n g message that it is my avowed wish that both the LA and Parliament consider the implications of any proposed changes affecting the delivery of services which are funded by taxpayers. I hope to be in touch with Peter to arrange a Tête-à-tête ..but I hope very much that you and he will take the time and trouble to consider not only the best interests of local residents and tax payers but also those of your constituents ..who are not necessarily one and the same.

I must go .. To visit my husband who is still gravely ill.

Best wishes

Dear Ms Gromkyo

Thank you for your email. Catherine is very pleased to hear that you have now received a response from Cllr Peter Morton and hopes you find his visit useful. Please do let her know if there is anything further she can assist with in the future.

I am sorry that the 'auto reply' emails you received made you feel your email was being blocked. That is not the case. Catherine receives many hundreds of emails each week and sometimes it can take a few days to reply, so the 'auto acknowledgement' lets people know their message has got through and that they will receive a reply.

With best wishes to you and to your husband.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 23 August 2015 03:59
To: WEST, Catherine
Cc: Lynne Featherstone
Subject: Fwd: Auto-reply: Thank you for your email to Catherine West MP

Dear Catherine

Good news! I have this evening received a reply from Peter Morton, You will see that he has accepted my invitation to visit me at home to discuss *inter alia* the ongoing consultative exercise about Haringey's suggested proposals *vis a vis* the provision and delivery of the LA's social services to the residents - (especially those over 65 and other vulnerable adults/youngsters with special needs) - who are also Tax payers - in the Borough. I understand that the Cabinet will not make an executive decision until December this year but that the closing date for comments and feedback is 1st October.

My husband [REDACTED] is presently in hospital (he collapsed, dangerously ill, 8 days ago and was rushed to the Whittington

for life saving treatment.) My husband and I have been married for [REDACTED]
[REDACTED]

I spend most of the day by his bedside so am not around to make/take telephone calls during normal working hours. I contacted you - our "new MP" (Highgate Ward) - because I was puzzled that I had not heard from Peter Morton whom I had invited (electronically)

to [REDACTED] on 4th August. I have just returned home from the hospital to find a message from Peter (21.07 hours).

I therefore retract the two further messages I had sent to you (see below) and apologise for hassling your office in this way. Belonging to the dinosaur generation I confess I occasionally feel that automated telephony - when robots take over from we humans - can undermine the INDIVIDUAL PERSONAL relationship and, too, uproot the old-fashioned ways of communicating with one another. "One size does not fit all" and I dislike "form letters/circulars" that are churned out automatically *en masse*. **Yes, of course I realise**, as a professional and business woman with years of experience, **that change is inevitable and NECESSARY - we must adapt or die** - post-millennium generations cannot understand **the aversion that those who were born and lived during the last century seem to have towards the technological, sociological, political, scientific and *modus vivendi* of the globalised world today!**

May I ask you kindly to forgive my (now superfluous) reminders that the robots [triggered automatically and electronically] intercepted and blocked so promptly and coldly yesterday and today?!! Viz:

SECOND request for a response (blocked)

I hope very much that my attempts to contact you - twice or three times now - are NOT blocked by the automated telephony that your constituency office has in place. I copy my original notes (sent electronically) below.

FIRST request for a response (blocked)

I do realise the pressures of a heavy workload but would MUCH appreciate an early response. I have asked Catherine for advice as to how to elicit a response to my e-message to Cllr Norton dated 4th August. I have written several times both to the Councillor and to the democratic secretariat but still no personal response. Are you able to remind him that I have been waiting to hear from him personally since early August .. And September will soon be here!

Catherine - you may well wish to ignore this preamble - all sound and fury signifying nothing - hot air exhaled by an elderly person who happens to be the registered carer of a very dear one who has fallen prey to the ruthless, cruel depredations of vascular dementia coupled with Alzheimer's disease that insidiously destroys the very core of the person that was, leaving the remnants of a discarded physical shell

that lies rejected, often ignored or even excommunicated from the self-preoccupied busy busy (and sometimes ignorant or indifferent) folk in the everyday "REAL" world outside. Even today - in these days of enlightened 're-thinking' - those suffering from unpredictable, progressive and incurable disease become isolated and cut off from their peers and their former way of life, confined within the same four walls, day after day.. from which it seems there is no escape. Those dear ones **who have no family or friends voluntarily to take on** the TLC and full responsibility - (at considerable material and financial expense; frequently, too, at the cost of personal health and future security of those who WISH AND CHOOSE to take on the daunting challenge of this responsibility for an indeterminate period) - may well find themselves in alien surroundings, surrounded by strangers, faced with unfamiliar routines and often, sad to say, indifferent or even callously **Impersonal** care. Each of their familiar worlds shrink inexorably, their modest possessions, hobbies and former friends steadily diminish in the evening of their mortal lives - pitifully painful to observe and to witness. (I generalise and there of course many EXCEPTIONS where compassion, care and devotion safely cocoon each and every vulnerable, frail and needy **person**, shielding them from the vicious **TOLL** that the cruel vicissitudes, confusion and sense of overweening loss ruthlessly **EXTRACT**, but also opening the heavy doors that otherwise imprison and isolate, thus - once more - bringing light and the warmth of human companionship to those entrapped and seemingly insensate human beings.

You may consider my impassioned comments beyond the bounds of "appropriate" discussion between MP and constituent. In my long life [and throughout the breadth of my wide experience in many of the diverse fields that define the disparate boundaries of the countless areas of human history, endeavour and achievement], I have cared for many close family members; our younger daughter suffered for 20+ years from anorexia, tragically still an incurable and too often fatal illness, from the age of 12 until her death aged ■■■; my late mother needed loving care for the last few years of her life as did my late father who lived with us in our family home for the last few months before he died; I was the principal carer of my late Aunt

who died at Christmas 2013, aged 100 years; I [REDACTED]

[REDACTED] I was the editor of a closed correspondence that formed a support network for and of those caring for those terminally ill with an eating disorder or who had been bereaved. I could itemise other of my voluntary interests over the years, but that is to overegg this one particular autobiographical aspect .. and is also irrelevant and boring!

Catherine, I believe I have already bombarded you with copies of my electronic messages to Cllr Morton. I hope very much that it will be possible to invite him over to our family home before August runs into September. The present consultative paper being widely circulated not only to the residents and taxpayers of the Borough of Haringey but to many other tangential but 'interested parties' **is of crucial significance and VITAL IMPORTANCE not only to Haringey's "service users" (hateful term) but - when Haringey makes its democratic executive decision in the dying days of 2015 and the new year 2016 - might well serve as the template for similar "democratically" derived social service (or any other LA service) policies henceforth in future.**

As long ago as the late 60s and 70s there was so much talk talk talk about Care in the Community [REDACTED]

[REDACTED] that were set up throughout the UK, most especially in deprived and disadvantaged large conurbations with a preponderance of high rise flats, often housing young single mothers with children, struggling desperately to survive and bring up their children alone.

There is still much talk talk talk about the IMPERATIVE that the NHS (a **national** and vast organisation, the largest employer of staff in the whole of Europe if not the world) and the Social Services provided by the Local Authority should LIAISE and co-operate or at the very least communicate between themselves, thus avoiding much duplication, waste and inefficiency. Both the NHS - a Goliath to the LA'S David - have established protocols, both employing a surfeit of administrators, pen pushers 'support' staff, statisticians, human resource and analysts who produce - for example - expensive, bespoke and professionally designed promotional, customer relation and information publications, many of which are distributed widely by Royal Mail from computerised records the data of which is seldom accurate, so that several copies of the same publication are duplicated/ triplicated/quadrupled to the same address, to each member of one family, married couples or partnerships or dead or gone away residents. .Festoons of red tape choke the smooth running of both the NHS and Local Authorities. The obsession that every detail be recorded, computerised and REPORTED over and over means that staff working in the field spend more time writing reports than visiting/caring for patients/'CLIENTS' "IN THE FIELD'. Both the NHS's and LA's propensity to turn to Agencies (at considerable cost) to fill staff vacancies with "temporary placement" or "supply" staff - all of whom are not salaried but who are paid much more pro rata than regular contracted staff, is indefensible. The agencies, outsourced service providers, and 'middle men" grow richer and richer,"earning" commission and other inducements at the taxpayers expense. Such "agency staff" are free to come and go as they please, and are usually more interested in the money they can earn than in the work they do or the patients they treat/serve. This practice undermines the employment of regular staff ,, locums, temporary, part time and work experience staff, exchanges and so forth now predominate in many of the Primary Care, GP practices, Secondary and Tertiary Care '**tranches**' of the NHS and, too, the 'lower' echelons of Local Authority staff,

including the domiciliary Carers, employed by Agencies on pitiful wages whilst the Agencies themselves in turn charge extortionate fees to the 'CLIENTS' they purport to serve. Dedication, commitment are much less apparent. The concept of 'vocation', dedication or commitment seems to be subsumed to 'cost effectiveness', prioritising scarce resources, means testing, assessments of perceived needs. The cost of labour being high vast sums are spent on disposables, hospital equipment on loan that cannot be recycled once used, state of the art telephony and computer systems that turn out to be not fit for purpose, the proliferation of technological "gizmos" to most staff, some of whom have no training in their use do NOT improve the standards of service in themselves. Moreover, the huge MOUNTAIN of debt and punitive interest charges, plus contractual agreements that all service, repair and maintenance be outsourced rather than carried out by a regular, onsite workforce etc., the cost of stationery (mostly used by administrative staff), peripherals and miscellaneous promotional or 'for information' material, the cost of designing, running and maintaining websites - some of which are technologically inept and not remotely customer friendly, ditto the automated telephony - all add up to a huge bill which cannot be justified at the expense of VITAL FRONT LINE SERVICES. Similarly, I note the very favourable terms of engagement contractually agreed between the higher echelons of executive, administrative and managerial staff in both the NHS and in Local Authorities. I do not consider it ethically sound that the early retirement of Executive Officers be agreed and taken but who then decide to accept a consultancy in another Local Authority or NHS Department - all at the expense of the tax payer. I am tempted to use that old Orwellian platitude ... all pigs are equal, but some pigs are more equal than others.

Catherine I realise this long diatribe from an elderly constituent does NOT carry much weight but, in view of Peter Norton's thoughtful and insightful response to my earlier messages to him (**please refer to the attached copy**) it maybe that you and he might exchange your *personal* views in regard to these very important issues. I am frankly discouraged by all the talk talk talk, surveys, questionnaires, personal interviews, announcements etc. that preempted the NO LESS THAN THREE ANNOUNCEMENTS 2012, 2013 and 2014 that "this or this service" had been set up (especially targeted at those isolated, confined to home, vulnerable and frail persons within the community) or e.g. the start of a regular telephone conference between all those working in different capacities - medical, social, therapeutic - with certain identified vulnerable patients and who would then (with the patient's prior agreement) liaise with each separate service provider with a view to rationalising and improving the "service package" being offered to each individual patient. Promises, promises ... but the every day reality in my own experience very rarely delivers .. I nevertheless have the highest regard for all those professionals working at the coal face and who are often officiously overseen by line managers/administrators monitoring every nuance and minute detail of their "performance" in the field/department, given "targets" to be met, unrelated to the personal professional relationship of the service provider and the 'client' but directed to the source of some obscure statistical or official analysis, subsequently printed out and published in multi-coloured close-printed charts and official reports for the delectation of those who stare at computer screens and key in all these reports, charts and data all day...

I thank you for your patience and, I hope, understanding of my present personal very real concerns not only for [REDACTED] but also for all those, perhaps less articulate or as noisy as I, who nevertheless **greatly value the outstanding facilities of the purpose built Haynes Centre (from funds bequeathed by the late Haynes sisters, private benefactors) and the CARING INVALUABLE CONTRIBUTION MADE BY THE PRESENT DEDICATED STAFF, THE INSPIRATIONAL LEADERSHIP/MANAGEMENT AND COMMITMENT demonstrated by Macqueen and his senior staff:** the friendly ambiance that is thus generated is a blessing that greatly benefits those whom we love and care for 24/7 365 days a year -

affording us the registered unpaid carers a few hours respite, confident in the knowledge that our dear ones are safe and cared for in a familiar environment, amongst friends - which affords a very rare if not unique opportunity for those suffering from RUTHLESS INCURABLE DISEASE to break free from the confines of their isolation, staring at the same four walls - and - for a while to enjoy the company of their peers and all the support workers. Most of us resist change .. but change to those whose lives are beset by anxiety, confusion and disorientation, who are battling dysphasia, the loss of memory, the inability to care for themselves, is, I passionately believe, a prescription for upset, even disaster - the like of which is a tsunami that destroys the relative stability and quality of their lives.

With the best of good wishes from your old constituent - who, although not a supporter of Labour politically, is confident that you will represent the interests of all Haringey's residents and tax payers

[REDACTED]

[REDACTED] but please communicate by email/Royal Mail whenever possible.

Cllr Peter Morton
Civic Centre
High Road
N22 4LE

1st October 2015

Dear Cllr Morton,

Objections to Council's CP Priority 2 Proposals: The proposed closure of the Grange and the Haven Day Care Centres & the proposal to transfer the dementia day opportunities at the Haynes Day Centre to an external provider

Summary of grounds for objections:

- Impact of proposed closures on the Haynes, service users and impact on carers
- Loss of capacity for specialist dementia care to meet current and future needs, the Haynes the sole service remaining
- Lack of clarity of re-assessment process, likely outcomes of reduced support and higher costs
- Lack of understanding of importance of transport to access services
- Lack of detail on proposed alternative services / suitability of provision in the community
- Lack of information on mid to long-term financial impacts for the users and the Council
- Lack of information and evidence to support proposals and hence inadequate consultation
- Inadequate involvement of users and/or carers in the redesign process

After several years of being ill my husband was diagnosed with early onset semantic dementia in [REDACTED]. He has been attending the Haynes since [REDACTED] 2010 since its opening, and for him it has become an extension of his home; he loves going to and being there and enjoys the company and friendship of the staff to whom he feels very close. Dementia narrows ones physical and as well as social world dramatically, and attending Haynes helps hugely to mitigate that for him. I had to stop work in 2009 to look after him as he could not be left alone and could not look after himself.

In these very difficult years with this terrible illness the only bright light had been the Haynes, where he is well looked after feels secure and is stimulated so far as his ever diminishing capacity allows. Naturally I have the peace of mind that he is somewhere safe and somewhere he enjoys being while catching up with all his other care issues. So I can say with some authority that the Haynes Day Care Centre is a place of excellence, with purpose built facilities and dementia trained experienced stable staff. This is of course recognised by others who over the years continue to visit the centre to learn from and share the experience. And over the years looking after him and his interests I almost became an expert myself, as many carers do, in dementia related things.

So it is with this background that I object strongly to the proposed closures of the Grange, another service of excellence, and the Haven where many with dementia are supported, and most concerned with the likely impact these closures will have on the service users and carers at the Haynes. I also strongly object to the proposed transfer of dementia day service at the Haynes to an external provider risking the sustaining of the excellence, risking the loss of expert staff, risking short-term gain but long-term costs, risking huge uncertainty for users, carers and staff.

The people with dementia need continuity, routine, stimulation in safe familiar surroundings supported by trained expert familiar staff if needs for more costly services are to be delayed.

Specialist day centres provide an important preventative service helping to maintain their wellbeing and helping them continue to live in their homes longer. I know that many carers at the Haynes would share these concerns and views, discussed at regular support group meetings.

The proposals and their impacts are contrary to Haringey's Corporate Plan Priority 2 Objectives, Dementia Commissioning Strategy, Equality Policies, and the Government policies as they are contained in the National Dementia Strategy, The Care Act and the NICE guidelines.

Please see below further detailed points supporting the objections to the proposals.

Kind regards,



Detailed points supporting the objections to the proposals

1. Impact of proposed closures on the Haynes, service users and carers

The consultation paper states that “The proposal to close The Grange would require the reassessment or review of the care and support needs of current service users with a view to identifying satisfactory alternative provision to meet the assessed needs... there will be a transition plan which could involve support at the Haynes Day Centre.” The Grange Day Centre is a specialist service supporting 17 service users per day with dementia assessed to be at the significant and critical level, who lack the capacity for independent living relying on others for their needs. They have complex needs and are unlikely to find satisfactory alternative provision in the community.

There are 18 service users per day at Haynes Day Care Centre, close to its design capacity of 20 users per day. As it is likely that most Grange users are assessed to need dementia day care services and/or require transition at the Haynes it would not be possible to accommodate them without impacting the service quality and without impacting the current service users. If the Haynes becomes the sole day centre for dementia and, if after reassessment very few users are found to have reduced level of needs, damaging service reductions would be imposed on many current users and their carers at the Haynes and/or the Grange contrary to their needs. We are concerned that the reassessment or review criteria would be made to reflect the number of places at the Haynes. We are also concerned that assessments or reviews may be carried out by people who are not familiar with dementia, contrary to The Care Act provisions which state that assessors must have a good knowledge of the person's condition.

The proposed closures of the Haven Day Centre, where up to half users have dementia would have similar impacts and put further pressure on the Haynes to the detriment of care to its current users.

2. Lack of information on alternative provision / suitability of provision in the community

The Council recognises that there are people with complex needs who require specialist services. People with dementia with a degenerative condition are in such a group requiring specialist services. Since all users of the Grange and the Haynes are clinically assessed as having severe dementia, it is unlikely that further assessments will find their needs are met by a lesser non specialist alternative provision. Demographic projections and improving diagnosis rates indicate that dementia numbers would rise significantly increasing demand

for such specialist services. The proposed closures cannot be justified if such current as well as long-term needs are to be met, and costly alternatives are to be avoided.

The consultation papers state that the council will move away from building based day opportunities but does not explain how specialist dementia day services can be provided within this approach.

People with dementia need familiar secure calm places with appropriate facilities, and this cannot be achieved without good purpose designed spaces. It is not building-less if care is simply moved to people's homes.

The Council's proposals rely on new untested and/or yet to be defined or developed new models of services. The Council provided no evidence that these new models would meet the current needs let alone the future demand. Although there is no objection to providing a wider range of services, it is very important that they are in place, proven to meet current needs and proven to have the potential to meet future demand before closures are considered if adequate support to the service users and their carers are to be secured.

The Council has not provided any information on the availability, and we are not aware of alternative specialist dementia day opportunities in Haringey. The proposed new models cannot substitute specialist services.

3. Impact of proposals on carers

Where access to comparable adequate and satisfactory support is not available and/or not secured the carers not only lose the limited respite they get, they would have to take on more responsibilities to fill the gap created by the closures and service changes.

In addition to their severe or critical dementia limiting mental or physical abilities, over 65% of the service users at the Grange and the Haynes are over 80 years or over, over 60% have a physical frailty or sensory impairment; as such most will not have the capacity to manage their personal budgets or manage accessing support, they would have to rely on their carers. This would be an additional burden on the carers.

The Care Act has given the carers some hope that their needs would be supported, but we are concerned that impact of the proposals on carers are not taken into account.

4. Transport provision and travel times

The Haynes is located to the western edge of Haringey. Any future service users from the east of Haringey will have long journeys limiting the time they spend at the day centre reducing benefits of attending the Haynes. The Grange should be retained to provide the specialist day service needed in the east of Haringey.

Currently all day centres provide transport. Accessing suitable alternative provision, even if they are / become available, would not be possible without transport provision leading to social isolation, loneliness and loss of quality of life both for the service users and their carers impacting their health and wellbeing.

5. Lack of information on financial impacts

The Council provided no information on the cost and financial impacts of its proposals on the users, the Council or other service providers, e.g. NHS, short and long-term.

The consultation papers state that 'more services can be provided with less financial input from the council, but provided no evidence or information to support this assertion.

It is important to acknowledge that service users with dementia and/or complex needs who attend centres, rather they are complementary. Without day centres service users would be isolated and their health and care would be compromised. They are likely to need a lot more costly support services much earlier. The health and wellbeing of their carers are also likely to be impacted to need greater and costlier support.

The Consultation papers state that service users will be encouraged to use Personal Budgets to access any support required to meet assessed need. However it is not clear how the personal budgets would be set, whether they would be sufficient to secure comparable or adequate quality and quantity of support. Information is not provided to clarify the cost implications of the proposals for the service users.

6. Inadequate consultation

The Council promised that "Where major changes to service users are proposed after budget setting, detailed plans will come forward and decisions will only be made after much more detailed consultation" (Para 7.1.4 of Item No 819 of 10 February 2015 Cabinet). This was reiterated by the EqlA produced to support the proposals. The consultation on proposed closures and service changes, and the subsequent co-design process, were completely inadequate and would not meet the *minimum* requirements for a statutory consultation.

No information on the type, shape and quantity of alternative or future provision, no information on the level of need, the re-assessment process, no information on timescales for change or no information on the community capacity are provided by the Council for a proper consideration of the proposals and their impacts.

The EqlAs that were produced are incomplete and inadequate, they do not fully identify impacts e.g. human and financial impact of closing the day centres. There is no information on how long-term needs are to be met.

7. Transferring the dementia day service at the Haynes to an external provider

The Council provided no information on the type, shape and quantity of alternative or future provision, no information on the level of need, no information on timescales, or any evidence that an external provider will be appropriate to meet the needs of people with severe dementia, any evidence of a successful sustainable example of an external provider. The Council provided no information in support of an external provider being able deliver a satisfactory comparable service while producing a surplus taking into account Council's current subsidy and current costs to service users. How is this to be achieved?

- i) by increasing costs to service users and/or introducing charges e.g. transport
- ii) by reducing costs that would impact quality of service, e.g. lower wages, untrained short term staff, overcrowding, lower staff/user ratio, loss of stimulating activities, loss of person centred activities and care, ready-made meals, etc. The Council provided no information on what would happen if the external provider is unable to continue.

The Council provided no evidence to support its statement that transferring the service at the Haynes Day Centre to a social enterprise would have minimal impact on existing carers and service users. The co-design process has been a narrow, superficial exercise with minimal input from users or carers.

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LATE BUSINESS SHEET

Report Title: Addendum Report to the Seven Sisters Regeneration, Tottenham – Compulsory Purchase Order 2016 – “London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016”

Committee/Sub etc: Cabinet

Date: 10th November 2015

Reason for lateness and reason for consideration

Due to changes to the compulsory purchase guidance on 29th October 2015.

This report forms an addendum (“the Addendum”) to the Seven Sisters Regeneration, Tottenham – Compulsory Purchase Order 2016 – “London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016” (‘the Cabinet Report’) to inform the Cabinet of the changes to the compulsory purchase guidance to reflect legislative changes and case law since 2004.

The “Guidance on Compulsory purchase process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of, compulsion” (‘the Guidance’) was published by the Department for Communities and Local Government (DCLG) on 29th October 2015, which was after the date that the Cabinet Report was submitted for publication.

The Addendum is therefore to be read as an addendum to the Cabinet Report, alongside a revised Statement of Reasons which is at Appendix 1 hereof. It should be noted that the recommendations for Cabinet have been updated in the Addendum at section 4 and that these recommendations should be considered by Cabinet, instead of those in the Cabinet Report.

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Addendum Report for: Cabinet – November 10th 2015

Item Number: 13

Title: Seven Sisters Regeneration, Tottenham – Compulsory Purchase Order 2016 – “London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016”.

Report Authorised by: Helen Fisher – Director, Tottenham Regeneration Programme



Lead Officer: Helen Fisher –Director, Tottenham Regeneration Programme

Ward(s) affected: Tottenham Green, Seven Sisters

Report for Key Decision

1. Why has this addendum been prepared?

1.1. This report forms an addendum to the Seven Sisters Regeneration, Tottenham – Compulsory Purchase Order 2016 – “London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016” (“the Cabinet Report”) to inform the Cabinet of the changes to the compulsory purchase guidance to reflect legislative changes and case law since 2004.

1.2. The “Guidance on Compulsory purchase process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of, compulsion” (“the Guidance”) was published by the Department for Communities and Local Government (DCLG) on 29th October 2015, which was after the date that the Cabinet Report was submitted for publication.

1.3. This report (“the Addendum”) is therefore to be read as an addendum to the Cabinet Report, alongside a revised Statement of Reasons which is at Appendix 1 hereof.

2. What does the Guidance say?

2.1. The original guidance entitled “Compulsory Purchase and the Crichel Down Rules” contained in ODPM Circular 06/2004 published on 31st October 2004 (“the Original Guidance”) has been cancelled by the Guidance and therefore the Cabinet Report, relevant considerations and associated recommendations and decisions must be read and made in light of the Guidance.

3. What is the impact on the Cabinet Report?

- 3.1. The Guidance has implications for section 7 of the Cabinet Report, in which the justification for the CPO is outlined. An updated version of this section is provided below, in light of the Guidance. The Cabinet should therefore read this section (3.4 - 3.17 of the Addendum) in place of section 7 in the Cabinet Report.
- 3.2. In addition the Cabinet are asked to consider the revised recommendations at section 4 of the Addendum.
- 3.3. The Statement of Reasons has also been updated to reflect the Guidance and is at Appendix 1 of the Addendum.

Justification for CPO

- 3.4. Section 226(1)(a) and (1A) of the Town and Country Planning Act 1990 (as amended by section 99 of the Planning and Compulsory Purchase Act 2004) requires the acquiring authority to “think that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land” and “that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objects— the promotion or improvement of the economic well-being of their area; (b) the promotion or improvement of the social well-being of their area; (c) the promotion or improvement of the environmental well-being of their area”.

Statement of Reasons

- 3.5. The reasons for making the order must be submitted by the acquiring authority (in this case LB Haringey) as part of the Compulsory Purchase inquiry. This is known as the Statement of Reasons and a draft of the Statement of Reasons for the Wards Corner CPO is attached at Appendix 1 of this Addendum. This sets out in detail the purpose of acquiring the land, the justification for doing so and provides the context for the order, including relevant planning policy, equalities impact, resources for delivery and local engagement undertaken. The following paragraphs from (a) to (c) are a summary of section 8 of the Statement of Reasons, which provides the justification for the CPO (see Appendix 1 of the Addendum).

(a) the promotion or improvement of the economic well-being of their area

- 3.6. Tottenham suffers from some of the highest levels of economic deprivation in the UK. The area has experienced a long period of relative decline moving from being a prosperous working suburb to one of high unemployment. The proposed development would create a substantial number of jobs and provide an economic stimulus into the area, acting as a catalyst to draw in greater investment in Seven Sisters and Tottenham. A number of economic

benefits can be directly attributed to the development (as set out in detail in section 8 of the Statement of Reasons (Appendix 1 of this Addendum)), including¹:

- 360 jobs directly involved in the construction of the development;
- 160 jobs (FTE) operational jobs supported by new employment space;
- 545 jobs indirectly created or induced by the construction of the development;
- 70 (FTE) operational jobs indirectly created or induced by the development;
- £2.1 million/ annum of net additional resident expenditure within local shops or services; and
- 15 new operational jobs created by this additional resident expenditure in the area.

- 3.7. Alternative proposals for the site focus on the refurbishment of the existing ground floor market, but do not offer the diversification of the retail offer provided through the comprehensive redevelopment of the site. Without this scale of development the diversity of retail units remains limited and a critical opportunity to strengthen and support the town centre will be missed. The Wards Corner S106 Agreement dated 11 July 2012 includes obligations that are intended to support the existing businesses and tenants on the development site to stay and thrive in the area, while helping to improve the retail offer and support the district centre to remain competitive.

(b) the promotion or improvement of the social well-being of their area

- 3.8. The delivery of the economic benefits referred to above and the environmental improvements referred to below will themselves improve the social well-being of the area. However, further, the housing proposed will bring substantial social benefits.
- 3.9. There is a pressing need for new housing in Haringey, as in the rest of London, given high levels of population growth. Seven Sisters in particular has low levels of home ownership, as well as a significant demand for new housing. The range of housing tenures in the area is limited and has historically focused on social rented housing. The comprehensive development proposed for Wards Corner would deliver 196 new homes for sale with a range of 1-3 bed units, contributing to the delivery of much needed housing in Haringey and London by optimising residential densities in a town centre where there is good, existing and planned, public transport accessibility. Overall it would result in a net increase of 150 homes on the site. The housing delivered will all be built to London Plan standards, with Lifetime Homes standards also being applied and 10% of the housing designed to be wheelchair accessible. The new housing will therefore be of a

¹ Report by Nathaniel Lichfield & Partners, Seven Sisters Regeneration Project Economic Benefits Assessment dated October 2015.

high quality, with amenity and playspace provision which exceeded the (now revoked) Haringey Council Housing SPD (2008) requirements at the time of the application being made.

- 3.10. To deliver the scale of residential development which is proposed in the Wards Corner planning permission requires using the full footprint of the site. While the site could come forward in parcels, the optimum number of units can be delivered through comprehensive redevelopment because the site can be used more efficiently, for example through only having one building core and reducing conflicts which arise from adjacent landowners. Alternative proposals do not include providing any additional housing and the land assembly required to undertake comprehensive development has proven that some properties cannot be acquired through agreement. It is therefore considered that compulsory acquisition of the site is required in order to deliver the high number and quality of residential units which the site has capacity for. To ensure that the development does deliver positive social benefits to the area, a number of monitoring and mitigating obligations are set out in the S106 Agreement for the planning permission.

(c) the promotion or improvement of the environmental well-being of their area

- 3.11. The Wards Corner development site and immediate area has been shown to have the potential to deliver a sustainable development within a well-designed public realm, but is overcome by serious constraints at present. The site is in a prominent location, where the Seven Sisters Road meets the High Road, and at a significant transport interchange for the Victoria Line, the Overground and a number of bus routes. The Cycle Super Highway route is currently being extended through the development site, due for completion in July 2016. The site has also been identified as a potential location for a station on the Crossrail 2 line. While this makes it an important gateway site into Tottenham, it is also a very busy place, with strategic roads on two sides creating a potentially hostile environment. The public realm in front of the development site feels tired and a number of vacant units front onto the main space around the station. This makes the area feel unattractive and unsafe, with the Seven Sisters area recording a higher crime rate than the average for Haringey and London.

- 3.12. The permitted Wards Corner development provides an opportunity to comprehensively redevelop and improve the public realm around the whole of the development site and provides a high quality and inclusive design, which seeks to address the connections between people and places. The proposed mix of retail and residential uses together with improvements to the transport interchange and public realm will bring vibrancy to the area and give rise to additional footfall that would serve to encourage the economic and physical regeneration process to extend along Seven Sisters Road and High Road. The development achieves the standards in sustainable design and construction required to minimise its impact on the environment; and the S106 Agreement contains further measures to ensure that any other

environmental impacts are managed, as well as providing financial contributions towards the environmental improvement of the area.

- 3.13. Control of the entire site enables a redesign of the building footprint allowing the new development to deliver a new and expanded public square around the station. This will create a new focal point for the community and a new entrance point into Tottenham. With a mixed use development overlooking the new public square there should be a positive impact on the perception of and potentially the actual levels of crime and safety in the area. Alternative proposals do not include upgrades to the public realm and fragmented land ownership would make the expansion of the public space and any comprehensive improvements difficult to achieve.

Compelling case in the public interest

- 3.14. Paragraph 76 of the Guidance provides as follows: Any decision about whether to confirm an order made under section 226(1)(a) will be made on its own merits, but the factors which the Secretary of State can be expected to consider include:

- (i) whether the purpose for which the land is being acquired fits in with the adopted Local Plan for the area or, where no such up-to-date Local Plan exists, with the draft Local Plan and the National Planning Policy Framework;
- (ii) the extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area;
- (iii) whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means. This may include considering the appropriateness of any alternative proposals put forward by the owners of the land, or any other persons, for its re-use. It may also involve examining the suitability of any alternative locations for the purpose for which the land is being acquired.

- 3.15. Dealing with each of these provisions in turn:

- (i) it is clear that the purpose for which the land is being acquired fits in with the adopted Local Plan for the area (see paragraphs 6.1 to 6.3 of the Cabinet Report);
- (ii) the contribution to the achievement of the promotion or improvement of the economic, social and environmental wellbeing of the area will be significant (see paragraphs 3.5 to 3.13 of the Addendum);
- (iii) it is clear that any alternative proposals put forward have little prospect of delivering the required regeneration benefits (see section 5 of the Cabinet

Report and 8.69 – 8.76 in the Statement of Reasons at Appendix 1 to this Addendum).

- 3.16. While point (iii) of paragraph 16 of the Original Guidance (Appendix A to the Circular) has not been included in paragraph 76 of the Guidance, prospects of implementation and the potential viability of the scheme for which the land has been acquired are still important issues, as stated at Tier 1 of the Guidance, paragraphs 13-15, and have been addressed in the Cabinet Report. It should still be noted therefore that Grainger has confirmed in the letter attached at Appendix 6 (of the Cabinet Report) that sufficient funds are in place to finance the delivery of the development. Grainger have submitted a development appraisal confirming that, based on the current appraisal, the scheme is viable for delivery. The appraisal has been reviewed externally by the DVS and the outcome of this review is at paragraph 6.28 of the Cabinet Report.
- 3.17. Furthermore, it is considered that the purposes of the proposed acquisition justify any interference with the human rights of those affected, and that the proposed Order is also justified having regard to the provisions of the Equalities Act 2010.
- 3.18. All of these provisions are addressed in greater detail in the Statement of Reasons (see Appendix 1 to this Addendum). Further, appropriate steps have been taken to seek to acquire the land needed by agreement, and it is clear that compulsory acquisition is necessary to acquire the relevant land. In the circumstances, it is considered that a compelling case in the public interest is established for making the CPO recommended.

4. Revised recommendations for Cabinet

- 4.1. That Cabinet notes that the pre-conditions for the CPO as set out in the Cabinet Resolution of 12th July 2014 have been met and complied with and that Grainger has confirmed that the pre-conditions contained within the Development Agreement of the 3rd August 2007 (as varied) have either been met and complied with, or can be met and complied with (as set out in paragraphs 6.11 to 6.29 of the Cabinet Report).
- 4.2. That (whether or not the pre-conditions for the CPO as set out in the Cabinet Resolution of July 2014 have been complied with) Cabinet resolve (taking account of the Guidance and both the Cabinet Report and the Addendum) to make a Compulsory Purchase Order to acquire all land and rights within the Site shown edged red on the plan in Appendix 1 for planning purposes pursuant to Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended), to enable Grainger to implement its planning permission on the basis that this will facilitate the redevelopment of the Site and promote or improve the economic, social and environmental well being of the area.
- 4.3. That Cabinet grant delegated authority to the Assistant Director of Corporate Governance, in consultation with the Chief Financial Officer and Assistant

Director of Property and Capital Projects (i) to make any necessary changes, if appropriate, to the draft Statement of Reasons consequent upon Full Council's consideration of the emerging planning policy papers and Regulation 19 approval for publication and submission thereof and (ii) on receipt of the Developer's Stage 2 Notice (as defined in the CPO indemnity agreement dated 23 January 2015) to make, serve and implement the London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016, including dealing with consultation with landowners and objections to the CPO, and preparation for and representation at any public inquiry.

- 4.4. That Cabinet grant delegated authority to the Assistant Director of Property and Capital Projects to serve the requisite Demolition Notices as set out in paragraphs 8.9 to 8.11 of the Cabinet Report on 12 Suffield Road.

5. Appendices

Appendix 1 – Statement of Reasons (updated to reflect the Guidance on Compulsory purchase process, October 2015)

**The London Borough of Haringey
(Wards Corner Regeneration Project)
Compulsory Purchase Order 2016**

**Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Acquisition of Land Act 1981**

STATEMENT OF REASONS

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APPENDICES:

- A Order Plan (appendix to Cabinet report)
- B Schedule of Interests (exempt appendix to Cabinet report)
- C The Planning Permission
- D Local Engagement by Grainger
- E Equalities Impact Assessment of the Wards Corner CPO (appendix to Cabinet report)
- F Planning Sub-committee Report and minutes of 25th June 2012
- G Planning history of Order Land
- H Reports: Cabinet Report and minutes of 15th July 2014 (minutes are an appendix to Cabinet report). Cabinet Report and minutes of 10th November 2015 (to be inserted after the Cabinet meeting of 10th November 2015)

- I Scheme plans (the Planning Permission)
- J Regulation 18 consultation on the Preferred Option for the Tottenham AAP – consultation comments and Council responses.
- K Stopping-up Order Plan
- L S106 Agreement (for the Planning Permission) (appendix to Cabinet report)

DRAFT

1 INTRODUCTION

- 1.1 This is the Statement of Reasons for the making of the London Borough of Haringey (Wards Corner Regeneration Project) Compulsory Purchase Order 2016 ('the Order') by the London Borough of Haringey ('the Council'). It has been prepared in accordance with the 'Guidance on Compulsory purchase process and the Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of, compulsion' ('the Guidance'), and forms the basis of the Council's Statement of Case for the purposes of Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007.
- 1.2 In this Statement of Reasons the land included within the Order extending to 1.20 ha. is referred to as 'the Order Land' as shown within the redline boundary on the Order Plan at Appendix (A).
- 1.3 The Council is the acquiring authority using its powers under section 226(1)(a) of the Town and Country Planning Act 1990 (as amended by section 99 of the Planning and Compulsory Purchase Act 2004) ('the Act'). The Council is also the local planning authority within the meaning of the Act.
- 1.4 The Council has given careful consideration to all relevant issues and, having done so, it is satisfied that there is a compelling case in the public interest to make the Order (per paragraph 12 of the Guidance). In particular, the Council is satisfied that:
 - compulsory acquisition of the Order Land would facilitate the carrying out of development, redevelopment or improvement on or in relation to the Order Land; and
 - such development, redevelopment or improvement is likely to contribute to the achievement of the promotion or improvement of the economic, social and/or environmental well-being of the Borough of Haringey for the reasons set out in Section 8.
- 1.5 The Schedule of Interests (at Appendix (B)) lists, where known, the owners, lessees, occupiers and tenants of the Order Land in addition to other parties with a qualifying interest (per section 12(2)(a) and 12(2A) of the Acquisition of Land Act 1981 (as amended) ('ALA 1981') including those properties which may have compensatable and/or injunctable rights to light which, if not released, would have the potential to frustrate the development, redevelopment or improvement of the Order Land.
- 1.6 It is intended that, unless acquired by agreement, all land and rights in the Order Land (and land for statutory reasons not included in the Order) would be acquired by the Council following confirmation of the Order. The Council will consider granting equivalent or alternative rights of way should that be necessary for any part of the Order Land.

- 1.7 The Council is promoting the Order to enable development of the Order Land by the demolition of existing buildings and the erection of mixed use development comprising class C3 residential, class A1/A2/A3/A4 uses, with access, parking and associated landscaping and public realm improvements ('the Development'). The Development would provide a catalyst for further regeneration in Tottenham.
- 1.8 On 12 July 2012, the Council granted planning permission ('the Planning Permission') and conservation area consent for (amongst other things) 3,693sqm of new retail space (use classes A1/A2/A3/A4 including space for a re-provided retail market) together with 196 residential flats, pursuant to an application submitted on behalf of Grainger Seven Sisters Ltd (being a wholly owned subsidiary of Grainger plc) ('Grainger').
- 1.9 Subject to confirmation of the Order, Grainger intends to carry out development pursuant to the Planning Permission, which can be implemented at any time on or before 11 July 2017.
- 1.10 As above, and set out in the Schedule of Interests and Order Plan (at Appendices (B) and (A)), the Order Land includes land owned by LUL. It is intended that the Order would include this land (including LUL's operational land), providing LUL with a separate and additional power to make representations on the Order to the Minister responsible for London Underground infrastructure, in accordance with Section 16 of the ALA 1981. In parallel, Grainger is continuing to negotiate to acquire LUL's interest in the Order Land by private agreement. As part of any negotiated agreement, Grainger would grant all necessary rights to LUL to ensure the continued safe operation and maintenance of the London Underground infrastructure that lies beneath the Order Land. The Council is satisfied that the objectives of regeneration can be achieved without interfering with the operational requirements of LUL.
- 1.11 Since December 2014, Grainger has been assembling the land it requires for the Development by private treaty. As at 2 October 2015, it has acquired 11 parcels by agreement and is continuing to negotiate on several other interests. It has also approached (and continues to approach) all of those properties who potentially have compensatable and/or injunctable rights to light in respect of the Order Land in order to ascertain whether they would be willing to release their rights.
- 1.12 However, agreement with owners of several properties within the Order Land (and those with interests in the Order Land) has not been possible. While all outstanding interests are included within the Order, Grainger remains willing, committed and able to acquire all outstanding interests in the Order Land by agreement during the Order process and will continue to seek to do so.
- 1.13 Taking account of the Guidance, the Council is satisfied that Grainger has made reasonable attempts to acquire outstanding interests in the Order Land by agreement including offering to assist business occupiers to relocate by identifying and securing

alternative premises. Full details of Grainger's negotiations with third parties are set out at Section [9] and Appendix (D). Grainger will continue to seek to acquire the remaining interests in parallel with the statutory Order process. In accordance with paragraph 2 of the Guidance, this Order is therefore being made only as a last resort.

1.14 The Council is satisfied that the tests in the Guidance are met and there is a compelling case in the public interest to make the Order, which justifies overriding private rights in the Order Land. This Statement of Reasons (at Section 8) demonstrates the following points (per paragraph 76 of Tier 2: Enabling Powers to the Guidance):

- i) The purpose for which the Order Land is being acquired (i.e. the Development) accords with the statutory development plan and national planning policy and guidance;
- ii) The Development would contribute to the improvement of the economic, social and environmental well-being of the area;
- iii) There is no other means of delivering the Development (in accordance with the Council's planning policy objectives) other than by acquiring the Order Land.

1.15 Furthermore, there are sufficient prospects of the development being delivered, the purposes of the Order justify any interference with human rights, and the Order is acceptable having regard to the objectives of the Equalities Act 2010.

2 BACKGROUND

2.1 The Order Land (and adjoining land), as shown on the Order Plan, is located above Seven Sisters Underground Station and forms part of the Seven Sisters/West Green district centre, which has long been identified by the Council as a key/gateway site for improvement and regeneration. As early as 2004, the Council published a development brief for Wards Corner/Seven Sisters Underground ('Development Brief'), which stated its vision for the Order Land as delivering a *'landmark development that acts as a high quality gateway to Seven Sisters, providing mixed uses with improved facilities'*.

2.2 In current planning policy, the Haringey Local Plan: Strategic Policies ('Strategic Policies') (adopted by the Council in March 2013) identifies Seven Sisters as a priority area for new development and regeneration and specifically envisages *'Wards Corner regeneration delivering houses, shops and public realm improvements through redevelopment and/or renewal'*. Further, the Council's 'preferred option' for its emerging Tottenham Area Action Plan ('AAP') proposes the allocation of the Order Land for comprehensive mixed-use development comprising commercial, retail and residential uses (consistent with the Development). The policy context that supports the Development is addressed in greater detail in Section 7.

- 2.3 Consistent with delivery of this programme, on 3 August 2007 the Council (in its capacity as land owner) entered into a conditional development agreement ('the Development Agreement') with Grainger to promote and implement comprehensive redevelopment of the Order Land. Subsequent to this, Grainger pursued its proposals, which culminated in the grant of the Planning Permission.
- 2.4 The Planning Permission was granted following completion of a legal agreement ('the S106 Agreement'), which was entered into between (amongst others) the Council and Grainger pursuant to section 106 of the Act. The S106 Agreement provides for (among other things): the provision of a new market following the closure and temporary re-location of the existing market (as located on the Order Land) during construction (including the offer of financial assistance to named traders); funding environmental improvements in the immediate shopping area; promoting the letting of the proposed new retail units to independent retailers; and recruiting local employment both during construction and following occupation of the development pursuant to the Planning Permission. The Planning Permission was the subject of a legal challenge, which was finally disposed of by the Court of Appeal in August 2013 (APP/Y5420/A/12/2169907).
- 2.5 The Order Land is often referred to locally as 'Wards Corner', which originates from the 3 storey early Edwardian former Wards Furnishing Stores building ('Wards Corner Building'), which occupies the southern part of the Order Land at the High Road/Seven Sisters Road junction. The Wards Corner Building is owned by LUL. The store itself closed in 1972 and the Wards Corner Building has been vacant above ground floor level for many years. The ground floor of the Wards Corner Building is used as a street level market, known as the Seven Sisters Market ('the Market'), currently let to traders from a diverse range of ethnicities¹. This ground floor of the Wards Corner Building was designated by the Council as an Asset of Community Value ('ACV')² in May 2014 pursuant to the Localism Act 2011, following an application made by the Wards Corner Community Coalition.
- 2.6 As noted above, the development granted pursuant to the Planning Permission (and subject to the S106 Agreement) provides for the provision of a new market to maintain its retail and community value.

3 CONTEXT OF THE ORDER LAND

Wider area – Tottenham

- 3.1 The Order Land is in Tottenham, which is located in north-east London, forming the western part of the Upper Lee Valley Opportunity Area (as designated through the

¹ According to a business survey conducted by AECOM (as URS) in May 2012. See Wards Corner CPO EQIA 2015 for further information.

² An Asset of Community Value (ACV) is land or buildings nominated by a local voluntary or community group which the council decides meets the requirements to be listed as an asset of community value. The statutory rules about assets of community value can be found in sections 87 – 103 of the Localism Act 2011 and in The Assets of Community Value (England) Regulations 2012.

London Plan) and the eastern part of the London Borough of Haringey, sitting directly east of Wood Green and Turnpike Lane.

- 3.2 Tottenham lies on the A10/A1010 Corridor and is served by the Victoria London Underground Line, serving both Seven Sisters and Tottenham Hale, and the London Overground Line, which was previously part of the West Anglia Line until May 2015. Overground connections are provided to Stansted airport, as well as links to Cambridge and Liverpool Street. The area is well served by the bus network and has good connections to the regional and national road network. Tottenham is only 12 minutes from the centre of London on the tube or train.
- 3.3 Tottenham comprises seven Wards (Tottenham Green, Seven Sisters, St. Ann's, Northumberland Park, White Hart Lane, Tottenham Hale and Bruce Grove). The long central spine of Tottenham High Road contains a mix of shops, sports, leisure and community facilities together with public buildings and some residential development. Tottenham High Road has a mixture of fine Georgian, Victorian and Edwardian buildings, some of which are listed by Historic England as having special architectural and historical interest of national importance. However, the High Road has been in decline over a number of years and a number of these heritage assets have suffered from neglect in the past. Investment by Heritage Lottery funding has specifically targeted the refurbishment and enhancement of the shop fronts and facades along Tottenham High Road, but there remain a large number on Historic England's at risk register.
- 3.4 The A10/A1010 Corridor stretches approximately 400 metres on either side of the A1010 from the M25 to Stamford Hill. It is an historic route into London, comprising six separate but adjoining conservation areas, that has become a diverse and varied mixed-use high street linking a series of north London communities. It is a vital part of the Upper Lee Valley and offers key infrastructure provision to the existing communities such as town centres, transport, education and health facilities. It contains many distinctive communities and town centres including Stamford Hill, Stoke Newington, Seven Sisters, Tottenham Green, Bruce Grove, High Road West (White Hart Lane), Northumberland Park, Angel Edmonton, Edmonton Green and Ponders End.
- 3.5 Two of Haringey's five district centres (being Bruce Grove/Tottenham High Road and West Green/Seven Sisters) are located in Tottenham, which compete with a number of centres in neighbouring boroughs including Brent Cross, Walthamstow and Edmonton Green in Enfield. Tottenham is also home to smaller local centres and shopping parades to meet day-to-day needs for shopping, services and facilities.
- 3.6 Tottenham, and more widely Haringey, suffers from extensive deprivation with high levels of unemployment and relatively low economic activity levels amongst its residents. As to this, the draft 'preferred option' AAP records:

'parts of the area also experience high levels of unemployment, benefit dependency, overcrowding and crime, and low levels of educational attainment, household income

and health. It also suffers from a poor public realm in some areas and a lack of accessibility to quality open spaces and there are deficiencies in community & recreation facilities.'

- 3.7 The Order Land is located within the Tottenham Green Ward. To the south of the Order Land is Apex House, being an office building owned by the Council (as landowner).
- 3.8 To the east of the Order Land is Tottenham High Road, part of the A10/A1010 Corridor (as above) and a Transport for London Route Network, which runs from Edmonton in the north to Stamford Hill in the south. On the same side of the road as the Order Land there is an extended width pavement from which there is stair access to a subway, which leads down into the Seven Sisters Underground station.
- 3.9 To the north of the Order Land is West Green Road, which is an important primary retail frontage within the Seven Sisters/West Green Road district centre.
- 3.10 To the west of the Order Land is Suffield Road. On the west of Suffield Road is a row of Victorian terraced residential properties. A number of these properties are subdivided into flats whereas others remain as single dwellings. Beyond Suffield Road to the west is another row of Victorian terraced houses and the Seven Sisters National Rail Station. Seven Sisters Station lies between Finsbury Park and Tottenham Hale on the Victoria Line and between Stamford Hill and Bruce Grove on the Lea Valley Line operated by London Overground from Liverpool Street.

Order Land

- 3.11 The Order Land is prominently located on the western side of Tottenham High Road and comprises 227-259 High Road, 709-723 Seven Sisters Road, 1a-11 West Green Road and 8-30 Suffield Road.
- 3.12 The central and southern part of the Order Land sits above the Seven Sisters Victoria Line Underground Station and tunnels. The Wards Corner Building is located at its south-eastern corner, the ground floor of which accommodates the Market (comprising 60 separate retail units).
- 3.13 The frontage to 227-259 High Road, with 2 and 3 storey properties, provides retail and commercial floorspace on the ground with residential flats on some 1st and 2nd floors. Located at 1a-11 West Green Road and 709-723 Seven Sisters Road are retail and commercial ground floor uses (and on some upper floors) with residential upper floor accommodation in 2 and 3 storey properties. As above, the West Green Road/Seven Sisters shopping area is classified as a district centre per the London Plan (as to which see Section 7).
- 3.14 8-30 Suffield Road is different in character, being a relatively quiet residential one-way street with 2 storey terraced properties. It provides rear access at its southern end to

some properties on Seven Sisters Road and High Road, together with small car parking areas at both the northern and southern ends.

- 3.15 The High Road frontage, Nos.1a/b and 1 West Green Road are located within the Seven Sisters/Page Green Conservation Area ('the Conservation Area'), being one of six Conservation Areas that combine to form the Tottenham High Road Historic Corridor stretching approximately 3.7km between Enfield in the north and Stamford Hill to the south. The Wards Corner Building at 227 High Road/725 Seven Sisters Road, together with Nos. 1A and 1B West Green Road, are locally listed buildings of merit.
- 3.16 The Order Land benefits from excellent public transport accessibility (PTAL 6a) with easy access to the London Underground, London Overground and many bus routes. The Seven Sisters mainline Station is identified as a proposed stop on the Crossrail 2 line, which would further increase the level of public transport accessibility.
- 3.17 In summary, the Order Land comprises 32 parcels of land under section 12(2)(a) of the ALA 1981. Of the 33 residential units, 29 are understood to be occupied (as at 1 July 2015)³.
- 3.18 The interests are correspondingly numbered on the Order Plan. In addition to those interests noted below, LUL has an interest in parcels 1 – 13, 15, 16, 23 and 29 – 32. Transport for London ('TfL') and the Council in their respective capacities as local highway authority also have interests in the Order Land.

Parcel 1 comprises part of a demolished site and half width of highway known as Seven Sisters Road;

Parcel 2 is the retail premises at the ground floor of 717 and 719 (odds) Seven Sisters Road, which is subject to a third party lease, and the residential premises above comprising three flats together with half width of highway known as Seven Sisters Road;

Parcel 3 is the retail premises at 715 Seven Sisters Road, which is subject to a third party lease, and those residential premises above together with half width of highway known as Seven Sisters Road;

Parcel 4 is the retail premises at 713 Seven Sisters Road and the residential premises above together with half width of highway known as Seven Sisters Road. Parcel 4 is within the ownership of the Council (as landowner);

Parcel 5 is the retail premises at 711 Seven Sisters Road, which is subject to leasehold interests, and those residential premises above together with half width of highway known as Seven Sisters Road;

³ NB: this is on the basis that 9-11 West Green Road is considered a single dwelling. Even though three rooms are separately let, there is a shared kitchen and bathroom

Parcel 6 is the retail and first and second floor flats, which are subject to third party leases, at 709 Seven Sisters Road and half width of highway known as Suffield Road and half width of highway known as Seven Sisters Road;

Parcel 7 is the parking area/compound land formerly known as 2A Suffield Road and half width of highway known as Suffield Road;

Parcel 8 is the parking area/compound land formerly known as 2 Suffield Road and half width of highway known as Suffield Road;

Parcel 9 is the buildings and yard formerly known as 4 Suffield Road and half width of highway known as Suffield Road;

Parcel 10 is the yards and outbuildings formerly known as 6 Suffield Road relating to D & P Garages and half width of highway known as Suffield Road;

Parcels 11 – 17 comprise residential properties at 8, 10, 12, 14, 16, 18 and 20 Suffield Road, respectively, together with their respective parking bays and respective half widths of highway known as Suffield Road. Parcels 13 (being 12 Suffield Road) 16 (being 18 Suffield Road) and 17 (being 20 Suffield Road) are within the ownership of the Council (as landowner);

Parcels 18 and 19 are residential properties at 22 and 24 Suffield Road, respectively, together with their respective parking bays and respective half widths of highway known as Suffield Road. They are unoccupied;

Parcels 20 – 22 comprise residential properties at 26, 28 and 30 Suffield Road, respectively, together with their respective parking bays and respective half widths of highway known as of Suffield Road;

Parcel 23 is the access road east of Suffield Road and part of Suffield Road, which is currently used as a car wash;

Parcel 24 is the retail premises subject to leasehold interests relating to Tropical Foods and Fair Deal Cash and Carry at 9 and 11 West Green Road, together with residential premises and half width of highway known as Suffield Road and half width of highway known as West Green Road;

Parcel 25 is the retail premises at 3 – 7 (odds) West Green Road leased (in respect of the ground and basement floors) to Sainsbury's Supermarkets Limited and residential premises above, together with half width of highway known as West Green Road;

Parcel 26 is the retail premises related to Cosmos News and residential premises at 1 West Green Road together with half width of highway known as West Green Road;

Parcel 27 is the retail premises at 1A and 1B West Green Road and part of West Green Road relating to Tottenham Wines and half width of highway known as West Green Road;

Parcel 28 is the retail premises known as Jinny's and residential premises known as 255 – 259 (odds) High Road together half width of highway known as West Green Road and High Road. The premises are subject to leasehold interests. In respect of the ground floor and basement, the lessee, Strandstar Limited is in liquidation;

Parcel 29 is the demolished site formerly known as 251 and 253 High Road, together with part width of highway known as High Road. It is understood that this parcel of land is unoccupied;

Parcel 30 is open space, subway and steps leading to Seven Sisters Underground Station, automated teller machine, cycle racks, seating, landscaping, cycle route, information boards, and half width of highway known as High Road. In addition to TfL and LUL, Sustrans have an interest in the parcel insofar as it relates to the cycle route and Clear Channel UK Limited in relation to various advertising hoardings;

Parcel 31 is unregistered land relating to the steps to the Seven Sisters Underground Station and subway under the highway known as High Road; and

Parcel 32 is the retail premises known as 227 – 249 (odds) High Road, which comprises all of the retail units that make up the Market, and part width of highway known as High Road and half width of highway known as Seven Sisters Road.

- 3.19 There are various mortgagees, rights of way, rights of utilities and other interests including rights to light over the Order Land (belonging to other qualifying persons under section 12(2A) of the ALA 1981) listed in Table 2 of the Schedule of Interests.

4 ENABLING POWER

- 4.1 Section 226(1)(a) of the Act states:

'A local authority to whom this section applies shall, on being authorised to do so by the Secretary of State, have power to acquire compulsorily any land in their area...

(a) if the authority think that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land.'

- 4.2 The Council is the acquiring authority for the purposes of this Order.

- 4.3 Accordingly, section 226(1)(a) of the Act provides the Council with power to acquire the Order Land compulsorily, if the Council thinks that such acquisition will facilitate the carrying out of the Development.

- 4.4 Section 226(1A) of the Act adds that the Council must not exercise this power unless it thinks that the Development is likely to contribute to the achievement of any one or more of the following objects:
- i) the promotion or improvement of the economic well-being of its area;
 - ii) the promotion or improvement of the social well-being of its area;
 - iii) the promotion or improvement of the environmental well-being of its area.
- 4.5 The principal economic, social and environmental benefits of the Development that will contribute to the Council's well-being objectives are set out below in Section 8.

5 PURPOSE OF THE ORDER

- 5.1 The Order is required to complete the assembly of the necessary land to enable delivery of a comprehensive redevelopment of the Order Land to provide a substantial improvement to the district centre's retail and residential offer, together with significant enhancements to the district centre's environment. In addition, the Development would act as a catalyst for the much-needed regeneration of this part of Tottenham. The Council's justification for the Order is set out in full at Section 8 of this Statement of Reasons.
- 5.2 The Council is satisfied that: (i) all of the Order Land is required to deliver the Development; and (ii) the social, economic and environmental benefits of the Development are not capable of being realised otherwise than as part of a comprehensive redevelopment of the whole of the Order Land. As there is no certainty that all of the interests can be acquired by negotiation, the Order is needed to enable full, unified ownership so the Development can proceed. Approximately 72% (by area) of the interests within the Order Land are: already owned by Grainger; or are already under agreement/contract to purchase by Grainger (as at 1 July 2015).
- 5.3 The principal remaining interests to be acquired pursuant to the Order are summarised in Section 10 and listed in the Schedule of Interests (Appendix (B)). In accordance with paragraph 2 of the Guidance, Grainger will continue to negotiate to acquire all remaining interests by private treaty.

6 THE PLANNING PERMISSION

- 6.1 The Planning Permission (HGY/2012/0915) authorises:

'Demolition of existing buildings and erection of a mixed use development comprising class C3 residential, class A1/A2/A3/A4 uses, with access, parking and associated landscaping and public realm improvements' (see Appendix C).

- 6.2 The development permitted by the Planning Permission is a mixed retail and residential scheme. Pursuant to the Planning Permission, new retail floorspace (3,693sqm) extends along the three main road frontages with servicing access via a new gated secure entrance from Suffield Road. This ground floor retail space would provide individual retail units of varying sizes with pedestrian access direct from the street together with space (865sqm) for a relocated market (subject to agreement with the traders) with improved facilities and a number of entrances from both Seven Sisters Road and the High Road to ensure maximum permeability.
- 6.3 The central section of the double height street level retail space would be set back to allow the creation of a landscaped public square on the High Road (linking with and extending the existing area of public highway) to transform the area around the entrance/exit from Seven Sisters Underground Station. This central section would also provide space at first floor level for a café/bar/restaurant use behind a fully glazed frontage overlooking the public square.
- 6.4 The 196 new homes proposed by the Planning Permission range from studios to 3 bed units and all would be for market sale or private rent. The net residential density (taking into account the consented commercial floorspace) is approximately 825 habitable rooms per hectare maximising the development potential of this highly accessible and prominent site.
- 6.5 In addition to the service yard for the retail space, the Planning Permission proposes 44 residential car parking spaces provided in the basement (accessed from Suffield Road) together with 196 cycle spaces. Commercial and residential refuse bins would be sited to enable emptying from the internal service road.

7 PLANNING POLICY

(1) Development Plan

- 7.1 The statutory development plan comprises:
- i) London Plan (March 2015) ('London Plan');
 - ii) Local Plan: Strategic Policies (March 2013);
 - iii) Haringey Unitary Development Plan (detailed saved policies) (adopted in July 2006 and as modified following adoption of the Strategic Policies in March 2013)
- 7.2 The following policies of the development plan are relevant to the making of the Order:

London Plan

- 7.3 The London Plan sets out a number of London-wide and more area specific policies that are material to the Development.
- 7.4 With a key focus on promoting growth, sustainable development (London Plan Policy 1.1) and a good, sustainable quality of life for everyone in London, the London Plan endorses the nationally-recognised London-Stansted-Cambridge-Peterborough Growth Corridor through Policy 2.3, Growth areas and co-ordination corridors. Tottenham lies towards the southern end of this Growth Corridor and this policy requires stakeholders to identify and develop linkages across, and the capacity of, such nationally recognised areas.
- 7.5 Policy 2.6 Outer London vision and strategy, emphasises the need to improve the quality of life in Outer London and to promote improvements that are sensitive to the needs of existing neighbourhoods.
- 7.6 Policy 2.7 Outer London economy, seeks to ensure that opportunities for economic growth are maximised and capacity is identified and brought forward in and around town centres with good public transport accessibility to support viable local economic activities, including leisure and retail, and higher density housing. This policy also advocates the use of compulsory purchase to assemble sites to promote growth of retail and leisure facilities in and around town centres.
- 7.7 Policy 2.8 Outer London transport recognises the benefits of integrating land use and transport planning to ensure use of vacant and under-used land is optimised.
- 7.8 Policy 2.13, Opportunity Areas and Intensification Areas, identifies the Upper Lee Valley (which includes Tottenham and the Order Land) as an Opportunity Area in London. The Mayor supports proactive policies for growth, regeneration and improved environmental quality in such areas and encourages partnerships in preparing and implementing opportunity area planning frameworks to realise these areas' growth potential. Opportunity Areas are described as *'the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility'*. Development proposals in Opportunity Areas should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth and, where appropriate, contain a mix of uses.
- 7.9 Policy 2.14, Areas for regeneration, identifies Tottenham (including the Order Land) as within a regeneration area because the area is in the 20% most deprived areas in London (based on Lower Layer Super Output Areas ('LSOA')). In such areas, the London Plan calls for action to promote sustained renewal by co-ordinated and integrated neighbourhood-based action and investment based on partnership working with the

Mayor, strategic and local partners. The boroughs should set out spatial policies which bring together regeneration, development and transport proposals together with improvements in learning and skills, health, safety, access, employment, environment and housing.

- 7.10 Policy 2.15, Town Centres, requires that developments should sustain and enhance the vitality and viability of the centre and relate the existing and planned roles of individual centres to the network as a whole to achieve its broader objectives. Boroughs should consider the scope for consolidating and strengthening them by encouraging a wider range of services; promoting diversification, particularly through high density, residential led, mixed use re-development; improving environmental quality; facilitating site assembly, including through the compulsory purchase process. Boroughs should also actively plan and manage the consolidation and redevelopment of medium sized centres to secure sustainable, viable retail offer; a range of non-retail functions to address identified local needs; and significantly higher density housing in a high quality environment.
- 7.11 Policy 3.1, Ensuring equal life chances for all, requires that developments should protect and enhance facilities and services that meet the needs of particular groups and communities and should not involve the loss of these facilities without adequate justification or provision for replacement.
- 7.12 Policy 3.3, Increasing housing supply, recognises the pressing need for more homes and requires boroughs to achieve and exceed their annual housing growth targets (in the case of Haringey, this equates to 1,502 new dwellings per annum for the period 2015 - 2025). In particular, the London Plan urges boroughs to realise the potential capacity on brownfield sites in opportunity areas, regeneration areas and growth corridors.
- 7.13 Policy 3.4, Optimising housing potential, calls on boroughs to identify the range of needs within their areas and to ensure that developments optimise housing output for different locations within the relevant density range.
- 7.14 Policy 3.8, Housing choice, calls on boroughs to identify the range of needs within their areas and to ensure that developments offer a range of housing choices in terms of size, type and tenure within an area.
- 7.15 Policy 3.9, Mixed and balanced communities, emphasises the importance both of promoting mixed and balanced communities by tenure and household income and of ensuring attractive design, adequate infrastructure and an enhanced environment. It states that a more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.

- 7.16 Policy 3.14, Existing housing, requires that loss of housing should be resisted unless the housing is replaced at existing or high densities.
- 7.17 Policy 4.7, Retail and town centre development, advocates a strong partnership approach to assessing need and identifying and bringing forward capacity for retail, commercial, cultural and leisure development in town centres.
- 7.18 Policy 4.8, Supporting a successful and diverse retail sector and related facilities and services, includes supporting convenience retail particularly in district centres (which includes the West Green Road/Seven Sisters Road district centre of which the Order Land forms part, as to which see further below) and the range of London's markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres.
- 7.19 Policy 4.9, Small shops, in considering proposals for large retail developments, Boroughs should, consider imposing conditions or seeking contributions through planning obligations where appropriate, feasible and viable, to provide or support affordable shop units suitable for small or independent retailers.
- 7.20 Policy 6.1, Strategic approach, encourages the closer integration of transport and development by encouraging patterns and nodes of development that reduce the need to travel, promoting walking by ensuring an improved public realm and seeking to ensure that all parts of the public transport network can be used safely and easily.
- 7.21 Policy 6.10, Walking, aims to bring about a significant increase in walking in London by emphasising the quality of the pedestrian and street environment, including through simplified streetscape, de-cluttering and access to all.
- 7.22 Policy 7.1, Lifetime neighbourhoods, promotes development that (amongst other things) contributes to people's sense of place, safety and security. Development should be designed to interface with surrounding land and improve people's access to social and community infrastructure, local shops, employment and training opportunities and public transport. The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.
- 7.23 Policy 7.3, Designing out crime, requires that a safe, secure and appropriately accessible environment should be created with developments which reduce the opportunities for criminal behaviour.

- 7.24 Policy 7.4, Local character, states that developments should have regard to the form, functions and structure of an area and should build on the positive elements that can contribute to establishing an enhanced character for the future.
- 7.25 Policy 7.5, Public realm, seeks the highest quality design and public realm that is secure, accessible and enables easy movement. Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks to help people find their way. Landscape treatment should be of the highest quality and contribute to the easy movement of people through the space, with opportunities for the integration of high quality public art.
- 7.26 Policy 7.8, Heritage assets and archaeology, advises that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 7.27 Policy 8.1, Implementation, provides that the Mayor will work with Government to deliver to realise the full housing potential of Opportunity Areas through the development of Housing Zones. In the first round of bidding Tottenham was named a GLA Housing Zone. Housing Zone status has been awarded to areas identified by London boroughs as key opportunity sites, to maximise development, fast track homes and deliver much needed infrastructure to boost development. Funding is secured as part of the designation to help deliver new investments into the area.
- 7.28 Policy 8.2, Planning Obligations, states that the consideration of planning obligations in relation to development proposals should take account of economic viability.

Local Plan: Strategic Policies

- 7.29 The Strategic Policies designate the West Green Road, High Road and Seven Sisters Road frontages of the Order Land as part of the West Green Road/Seven Sisters Road district centre. The Strategic Policies regard the district centre as an important shopping destination for the local community.
- 7.30 The Strategic Policies include the Seven Sisters Underground Station at the eastern end of the Seven Sisters Road Corridor (extending westwards into the adjoining boroughs of Hackney and Islington) as a priority area for change with a strategic role to play in the future growth of the borough. In setting out the Council's aspirations for this Corridor, the Strategic Policies envisage the

'Opportunity for ensuring that the Seven Sisters area and the tube and train station provides landmarks/gateways to aid legibility through redevelopment and/or renewal;

.....

'Wards Corner regeneration delivering houses, shops and public realm improvements through redevelopment and/or renewal'

- 7.31 Policy SP0, Presumption in favour of sustainable development, accords with the presumption in favour of sustainable development (per the National Planning Policy Framework (2012) ('NPPF')) and confirms that the Council will work proactively to secure development that improves the economic, social and environmental conditions in Haringey.
- 7.32 Policy SP1, Managing growth, identifies Tottenham High Road and the Seven Sisters Corridor as areas of change where development will be promoted.
- 7.33 Policy SP2, Housing, states that the Council will aim to provide homes to meet Haringey's housing need through a range of requirements for new development, including meeting the density levels set out in the London Plan and meeting affordable housing targets subject to viability.
- 7.34 Policy SP7, Transport, seeks to locate major trip generating developments in locations with good access to public transport and so better integrate transport and land use planning and promote road safety and pedestrian movement particularly in town centres and close to local services.
- 7.35 Policy SP8, Employment, looks to support local employment and regeneration aims and Policy SP9, Improving skills and training to support access to jobs and community cohesion and inclusion seeks to address unemployment by increasing the employment offered in the borough.
- 7.36 Policy SP10, Town Centres, promotes the distribution of retail growth to meet the required needs in the Metropolitan and five district centres. The Council will promote and encourage development of retail, office, community, leisure, entertainment facilities, recreation uses, arts and cultural activities within its town centres according to the borough's town centre hierarchy. The district and town centres (including West Green Road/Seven Sisters) will continue to be supported and strengthened as important shopping and service centres to meet people's day-to-day needs. The Council will take a proactive partnership approach to reinvigorating these town centres, widening their role and offer, developing their identities, improving the public realm and accessibility to them.
- 7.37 Policy SP11, Design, requires that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.

- 7.38 Policy SP12, Conservation, looks to ensure the conservation of the historic significance of Haringey's heritage assets, their setting, and the wider historic environment.

Haringey Unitary Development Plan: Saved Policies

- 7.39 A number of policies from the Haringey Unitary Development Plan 2006 (UDP) have been saved and sit alongside the Local Plan: Strategic Policies. Relevant policies from this document include ENV7: Air, Water and Light Pollution which requires developments to control potential pollution by locating in areas that minimise the levels of air, water and light pollution created and minimising any impacts where appropriate.
- 7.40 EMP5: Promoting Employment Uses supports employment generating activities outside of Defined Employment Areas where trips generated by the proposal are sustainably catered for Policy TCR5: A3 Restaurants and Cafes sets out a number of criteria which must be taken into account when assessing proposals for restaurants and cafes, including management of the use and the impact on the town centre. Policy M9: Car Free Residential Developments sets out requirements for proposals which do not provide car parking, including good public transport accessibility. Policy CSV7: Demolition in Conservation Areas seeks to protect buildings within Conservation Areas unless in exceptional cases where substantial community benefit would result from the total or substantial demolition of the buildings.
- 7.41 There is reference to Wards Corner as a key site in the West Green Road/ Seven Sisters town centre, within the supporting text for Town Centres and Retailing chapter; and Wards Corner (with Council Offices at Apex House) is identified as a site specific proposal (site no. 21) for comprehensive mixed use development, with specific reference to the Development Brief .

(2) Other Material Considerations

NPPF

- 7.42 The NPPF was published by the Government in March 2012 and introduces a presumption in favour of sustainable development⁴. It adds that the policies in paragraphs 18 – 219 taken as a whole constitute the Government's view of what sustainable development in England means in practice for the planning system.
- 7.43 At paragraph 7, the NPPF sets out three roles for the planning system in contributing to sustainable development:
- *'an economic role - contributing to building a strong, responsive and competitive economy... ;*
 - *'a social role - supporting strong, vibrant and healthy communities...'; and*

⁴ NPPF paras. 11-16

- *'an environmental role - contributing to protecting and enhancing our natural, built and historic environment...'*⁵

7.44 The above roles are mutually dependent.⁶

7.45 Paragraph 9 of the NPPF provides that *'pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life,'* including replacing poor design with better design, improving the conditions in which people live, work, travel and take leisure and widening the choice of high quality homes.

7.46 The NPPF states that *'proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.'*⁷

7.47 To help achieve economic growth, it advises local planning authorities to *"plan proactively to meet the development needs of business and support an economy fit for the 21st. century"*.⁸

7.48 Paragraph 17 sets out 12 core land-use planning principles, which should underpin decision-making, including that planning should:

- (i) be genuinely plan-led empowering local people to shape their surroundings;
- (ii) be creative in finding ways to enhance the places where people live;
- (iii) proactively support sustainable development to deliver homes;
- (iv) always seek to secure high quality design;
- (v) encourage the effective re-use of brownfield land;
- (vi) promote mixed-use development; and
- (vii) conserve heritage assets commensurate with their significance.

Building a strong, competitive economy

7.49 Section 1 of the NPPF focuses on the need to create a sustainable economy by creating economic growth through jobs and prosperity. Significant weight is placed on the need to support economic growth through the planning system and priority areas should be identified for economic regeneration, with strategic sites identified for local and inward investment to meet the economic vision for the area.

Ensuring the vitality of town centres

⁵ NPPF para. 7

⁶ NPPF para. 8

⁷ NPPF para. 12

⁸ NPPF para. 20

- 7.50 Section 2 of the NPPF requires that planning policies promote competitive town centres, with a diverse retail offer and retain and enhance existing markets to ensure that markets remain attractive and competitive. Policies should also recognise the role that residential development can play in ensuring the vitality of town centres and where a town centre is in decline, a local authority should plan positively for the future to encourage economic activity. Sites should be allocated to meet the scale and type of development needed in town centres.

Promoting sustainable transport

- 7.51 Section 4 of the NPPF outlines that a pattern of development which facilitates the use of sustainable modes of transport should be encouraged. Developments which generate significant amounts of movement should be located where the need to travel will be minimised and use of sustainable transport maximised. Developments should be located and designed to give priority to pedestrian and cycle movements, have access to high quality public transport facilities and to create safe and secure layouts which minimise conflicts between different street users and avoid street clutter. For larger scale residential uses, policies should promote a mix of uses to provide a balance of land uses which minimises journey lengths for employment, shopping, leisure and other activities.

Delivering a wide choice of quality homes

- 7.52 Section 6 sets out the manner in which local planning authorities should boost significantly the supply of housing to meet the objectively assessed need for housing. Local authorities should plan for a mix of housing based upon current and future demographic trends, market trends and the needs of different groups in the community.

Requiring good design

- 7.53 Section 7 advises that the Government attaches great importance to good design which is a key aspect of sustainable development and should contribute to making places better for people. It states the importance of planning positively for the achievement of high quality and inclusive design for all development, including for individual buildings and public spaces. Developments should establish a strong sense of place using streetscapes and buildings and should optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. They should also respond to local character and history, create safe and accessible environments and be visually attractive as the result of good architecture and appropriate landscaping.

Promoting healthy communities

- 7.54 Section 8 states that planning policies and decisions should aim to achieve places which promote: (i) opportunities for members of the community to meet through (amongst other things) mixed-use developments and active street frontages; (ii) safe and accessible environments where crime and disorder do not undermine the quality of life;

and (iii) safe and accessible developments. Planning policies and decisions should plan positively for the provision and use of shared space, such as local shops, and guard against the unnecessary loss of valued facilities and services. They should also ensure that established shops are able to develop and modernise in a way that is sustainable and retained for the benefit of the community.

Conserving and enhancing the historic environment

- 7.55 Section 12 states that, in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and the opportunities to draw on the contribution made by the historic environment to the character of a place. The local planning authority should identify and assess the particular significance of any heritage asset that might be affected by a proposal. The more important the asset, the greater the weight that should be attributed.

Publication Draft Tottenham AAP

- 7.56 In February 2015 the Council published for Regulation 18 consultation the 'preferred option' for the emerging Tottenham AAP together with other draft development plan documents. The consultation period ended on 27 March 2015 and the Council's responses to the consultation responses received were published on 13th October 2015, along with the Tottenham AAP Publication Draft which has been informed by these representations. These documents have been published for consideration by Cabinet on the 20th October 2015 and by Full Council on 23rd November 2015 for approval to go to an Examination in Public of the AAP, which will include a public consultation on the Tottenham AAP Publication Draft from December 2015 to January 2016.
- 7.57 The Tottenham AAP Publication Draft sets out policies to guide development and regeneration across Tottenham and key planning requirements for identified development sites.
- 7.58 It sets out the Vision for Tottenham, which is that:

'Tottenham will be the next great area of London. It will build on its geographical, natural and cultural strengths and capitalise on the dynamics of neighbourhood improvement, the significant infrastructure investments being delivered in the area and the availability of large development sites. The combination of transformative actions and continuous incremental improvement will unlock 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.'

Tottenham's transformation will benefit existing as well as future residents of Tottenham. It will build on the strength and resilience of the existing community to help deliver a positive future for Tottenham.'

7.59 A Local Strategic Policy sets out the planning policy for the Seven Sisters and West Green Road District Centre (SS1) which includes promoting positive regeneration in the area, retaining the viability of the shopping area, active town centre uses on all ground floor street frontages, a high quality urban realm around Seven Sisters Station and retention of Seven Sisters Market.

7.60 Wards Corner is identified as Site SS5 with key planning requirements listed as (INSERT SITE ALLOCATION POLICY WORDING WHEN FINALISED – POST 23rd NOV FULL COUNCIL)

- *'Comprehensive masterplanned development is required on this site to ensure that this site delivers a high quality, coordinated development appropriate for a location which is a key gateway into Tottenham.*
- *Proposals should ensure re-provision of the existing market will be on site and arrangements should be made for the temporary housing of the market whilst the proposal is being built out. Secure retail and other town centre uses at ground floor level onto the West Green Road, High Road and Seven Sisters Road frontages.*
- *Retail and other town centre uses will be required at ground floor level frontages onto the West Green Road, High Road and Seven Sisters Road frontages to ensure this site contributes towards strengthening and reinvigorating the town centre.*
- *This site is within the Seven Sisters/ Page Green Conservation Area and any development should enhance its setting and appearance.*
- *Ensure a high quality public realm is secured on all frontages and that it is designed appropriately to demarcate an important arrival point into Tottenham.*
- *Adjacent to this site is the Apex House site allocation, which is projected to come forward during the same time period as Wards Corner. The building at Wards Corner should be designed with an understanding of how it will relate to the strategic vision for Tottenham and particularly the type and scale of development which is outlined in the site allocation for Apex House.*
- *This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.*
- *Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.⁹*

7.61 As part of the Regulation 18 consultation on the Preferred Option for the Tottenham AAP, the Council has given proper consideration to all comments received. These comments have now been published alongside the Council's response. Those comments that relate to the Wards Corner site allocation are at Appendix (J).

Development Brief

⁹ Tottenham Area Action Plan Preferred Option Consultation Draft Feb. 2015 page 54

- 7.62 In January 2004, the Council approved the Development Brief which includes the Order Land together with properties to the west on the north side of Seven Sisters Road and Apex House to the south. The Development Brief supports the creation of *'a landmark development that acts as a high quality gateway to Seven Sisters, providing mixed uses with improved facilities and safer underground station access.'*¹⁰
- 7.63 The Development Brief then goes on to set out a series of Development Principles to guide future redevelopment.

Tottenham Strategic Regeneration Framework 2014 ('TSRF')

- 7.64 The TSRF, while not planning policy, was approved by the Council in March 2014 and is a material consideration. It sets out 7 strategies for success that will guide the Tottenham Regeneration Programme, many of which resonate with the Development such as: (i) improved access to jobs; (ii) building new, high quality homes; (iii) creating better public spaces to meet, shop and have fun; and (iv) attracting the right investment and quality development.
- 7.65 The TSRF also includes a vision for Seven Sisters as being a gateway to Tottenham, characterised by 'high quality, well-connected public spaces becoming known as a place to do business and socialise throughout the day and evening'.

Upper Lee Valley Opportunity Area Planning Framework ('OAPF')

- 7.66 The OAPF was adopted by the Mayor in July 2013 as Supplementary Planning Guidance to the London Plan and sets out an overarching framework for the Upper Lee Valley and contains a section focused on the A10/A1010 Corridor for which it proposes significant growth. The OAPF aims to ensure the opportunities and regeneration benefits extend to the whole of the Upper Lee Valley by connecting the existing A10/A1010 communities to the growth areas, industrial land and Regional Park. It was produced by the GLA working with TfL and the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney.
- 7.67 One of the eight objectives for the OAPF is for:

'Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park.'

- 7.68 Other objectives focus on more general deliverables for the area, including delivering new well designed homes, new jobs, significant investment and improvements to transport infrastructure and full integration between existing communities and the benefits delivered by new developments.

¹⁰ Wards Corner/Seven Sisters Underground Development Brief, Haringey Council January 2004

- 7.69 To achieve this objective, the OAPF looks in detail at the main centres along the A10/A1010 Corridor and identifies individual visions for these centres. For Seven Sisters and Tottenham Green it proposes that Seven Sisters will be a gateway into Tottenham and the High Road and that the comprehensive redevelopment of Wards Corner will help bring new homes to the area, and create major new retail space and public spaces. It also envisages that public realm improvements will link Seven Sisters to Tottenham Green, the largest public space on the High Road.

8 JUSTIFICATION FOR COMPULSORY PURCHASE

- 8.1 Paragraph 2 of the Guidance states:

'Acquiring authorities should use compulsory purchase powers where it is expedient to do so. However, a compulsory purchase order should only be made where there is a compelling case in the public interest... When making and confirming an order, acquiring authorities and authorising authorities should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected.'

- 8.2 Paragraph 12 of the Guidance states:

'It is the acquiring authority that must decide how best to justify its proposal to compulsorily acquire land under a particular act. The acquiring authority will need to be ready to defend the proposal at any inquiry or through written representations and, if necessary, in the courts.'

- 8.3 Having regard to Stage 2: justifying a compulsory purchase order and paragraph 76 of Tier 2: Enabling Powers of the Guidance, the Council notes that, where a compulsory purchase order is promoted pursuant to section 226(1)(a) of the Act, the Secretary of State will take into account the following issues:

- (a) Whether the purpose for which the Order Land is being acquired fits with the adopted Local Plan for the area (see section 8(i) below);
- (b) The extent to which the Development would contribute to the achievement of the promotion and/or improvement of the economic and/or social and/or environmental well-being of the Council's area (see section 8 (ii) – (iv) below); and
- (c) Whether the purposes for which the Order Land is to be acquired could reasonably be achieved by any other means within a reasonable timeframe (see section 8 (v) below).

8.4 These are each considered below in relation to the Order and the Development. Later sections of this Statement of Reasons consider the prospects of delivery of the Development and the issues of human rights and equalities.

(i) Whether the purpose for which the Order Land is being acquired fits in with the adopted Local Plan

8.5 The compulsory purchase of the Order Land is required to deliver a comprehensive redevelopment scheme and is the only approach available to the Council to optimise the benefits offered from a key strategic site within a priority regeneration area. For the reasons set out below, the acquisition of the Order Land to facilitate delivery of the Development would fully accord with the development plan and other guidance including national planning policy framework, draft policies, and supplementary planning guidance.

Principle of Development

8.6 Pursuant to Policy 2.13 of the London Plan, the Upper Lee Valley (which includes Tottenham) is identified as one of London's Opportunity Areas where proposals for regeneration (particularly those, such as the Development, which propose new housing and commercial development)) are encouraged to realise the areas' growth potential.

8.7 The transformation of Tottenham (and more specifically, the Order Land) is also promoted at a local level. In particular: (i) Policy SP1 of the Strategic Policies identifies the Order Land as falling within an area where new development will be promoted, having a strategic role to play in the growth of the borough; (ii) the TSRF confirms that Seven Sisters is a key part of the regeneration vision, with the redevelopment of Wards Corner an objective of the TSRF Delivery Plan; (iii) the OAPF recognises redevelopment opportunities as an objective for Tottenham High Road; and (iv) the publication draft of the Tottenham AAP recognises the role of Wards Corner as contributing towards Tottenham's transformation. In accordance with the development plan and national policy imperatives for regeneration, the Development would bring major new investment into the area, which has the potential to act as a catalyst for further transformational investment in Seven Sisters and Tottenham.

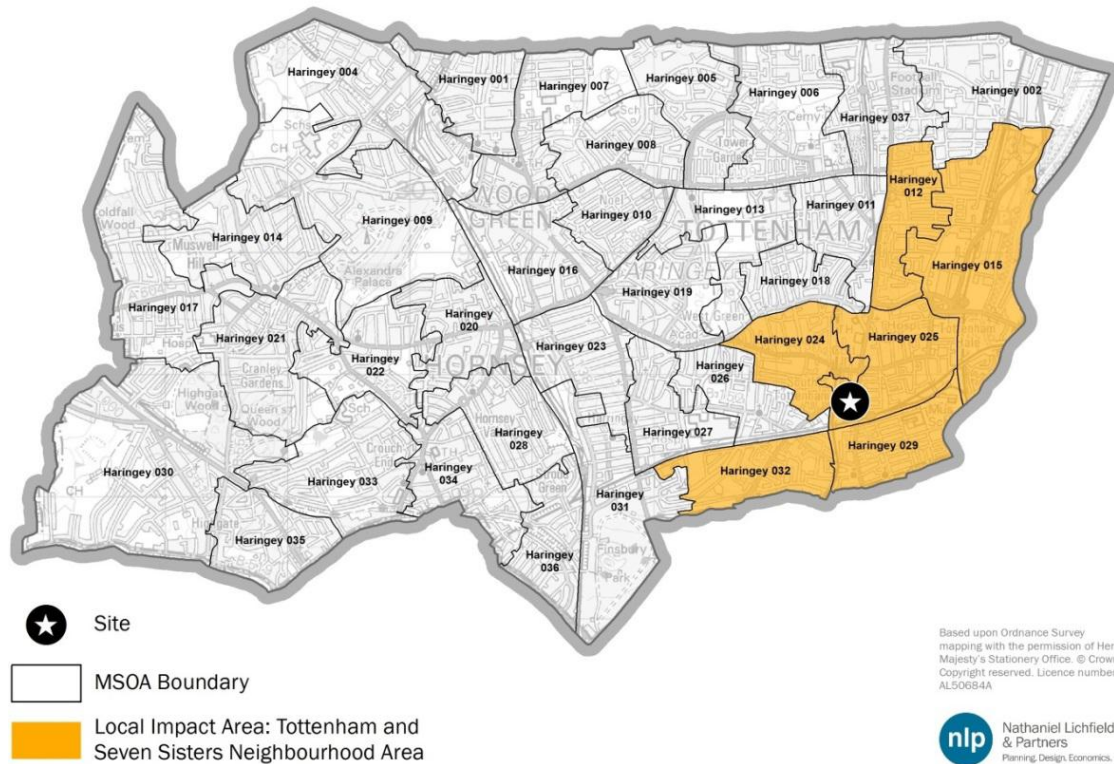
8.8 Haringey is the 44th most deprived local authority area in England, and the second most deprived in London¹¹. At LSOA level, Haringey 024B (the LSOA in which the majority of the Order Land falls, see figure 1) is within the 10% most deprived in England and Haringey 025D (the LSOA in which some of the Order Land falls, see figure 1) is within the 20% most deprived in England¹². The renewal of the Order Land would deliver compelling regeneration benefits for the area (per London Plan Policy 2.14), by securing:

11 According to the rank of proportion of LSOAs in most deprived 10% nationally in the English indices of deprivation 2015, published on 30th September 2015 by the Department for Communities and Local Government.

12 According to the Index of Multiple Deprivation (IMD) Decile in the English indices of deprivation 2015, published on 30th September 2015 by the Department for Communities and Local Government.

a retail scheme which is appropriate for this important site at the gateway to Tottenham; provision of many new homes for the area; and creation of a new public square at a key transport interchange. This new development, together with the re-provision and improvement of the Market, would better serve the local community.

Figure 1: Haringey Lower Super Output Areas and the Order Land location



Source: Seven Sisters Regeneration Project Economic Benefits Assessment, NLP October 2015.

- 8.9 The proposed mix of uses within the Development would also enhance the night-time economy of the district centre. The Development is, therefore, fully in accordance with London Plan Policy 2.6, which seeks to improve quality of life in outer London in a manner which is sympathetic to the existing community and Policies SP1 and SP10 of the Strategic Policies.
- 8.10 Further, the regenerative purposes to which the Order Land would be put fits squarely with the requirement set out in section 2 of Appendix A of the Circular, namely that the available powers are used by acquiring authorities to *'implement the proposals in their community strategies and Local Development Documents'*.
- 8.11 As set out in Section 7 of this Statement of Reasons, the planning framework identifies the Order Land as a gateway or landmark site, which can deliver improvements to the existing housing, retail and public realm offer. The delivery of new, mixed tenure housing, optimisation of a site with excellent transport capacity and the diversification of retail in a district centre, amongst other benefits, would secure sustainable

development in a highly accessible location in accordance with the, London Plan Policy 1.1, Policy SP1 of the Strategic Policies and the NPPF (paragraphs 7, 9 and 14).

- 8.12 Accordingly, the purpose for which the Order Land is being acquired accords with the adopted planning policy for the area (as was recognised by the grant of the Planning Permission).
- 8.13 The intention to bring forward a significant development at the Order Land has been articulated by the Council for over ten years, since the publication of the Development Brief. That the Development has not come forward yet, despite planning policy support and a willing developer, reinforces the need for the use of compulsory purchase powers. The Council refers to the following key aspects of the Development:

Housing

- 8.14 The Development proposes new private housing for Haringey. As to this, the development consented pursuant to the Planning Permission includes 196 private homes. Additional homes would *'boost significantly the supply of housing'* (per paragraph 47 of the NPPF) and contribute towards the Council meeting both its target to deliver 1,502 new dwellings per annum for the period 2015 – 2025 (per Policy 3.3 of the London Plan) and the Haringey-wide need for housing set out at Policy SP2 of the Strategic Policies. The Development also accords with Tottenham's designation as a Housing Zone.
- 8.15 The Order Land currently comprises 33 residential units (giving rise to a density of 119 habitable rooms per hectare), which is far below the residential density requirements of a site with a PTAL rating of 6a. The Development would result in a net increase of housing at the Order Land. In this regard, the development pursuant to the Planning Permission proposes 564 habitable rooms resulting in a density of 787 habitable rooms per hectare and, therefore, ensures optimum use of a highly accessible location (per Policy 2.7 and Policy 3.8 of the London Plan and Policy SP2 of the Strategic Policies). Further, the net increase in the provision of housing at the Order Land is also supported by London Plan Policy 3.14.
- 8.16 It is proposed that the Development would provide a mix of residential units. Indeed, the residential component of the development pursuant to the Planning Permission comprises a mix of studio (2.5%), one bed (24.5%), two bed (55%) and three bed (18%) units, which would make a positive contribution towards the needs of the Borough. Given the district centre location of the Order Land and the commercial nature of the main frontages, four bedroom units were not considered suitable in this location.
- 8.17 In light of the above, the Development would secure a mixed and balanced community at the Order Land in accordance with Policy 3.9 of the London Plan and paragraph 50 of the NPPF. In respect of the development consented pursuant to the Planning

Permission, all residential units (other than the duplexes) would meet Lifetime Homes standards and 10% of all units would be wheelchair adaptable.

Play Space/ Amenity Space

- 8.18 The Development would facilitate the delivery of well-designed play and amenity space. The development permitted by the Planning Permission demonstrates that proposals can be designed that exceed the children's play space requirements of the Policy 3.6 of the London Plan and the London Plan's Supplementary Planning Guidance 'Providing for Children and Young People's Play and Informal Recreation'. As to the consented scheme, amenity space is proposed in the central courtyard of the at first floor level, overlooked by the residential units (in accordance with Policy 7.3 of the Local Plan). The provision of amenity space accords with national and local planning policy.

Retail

- 8.19 A major component of the Development is the improvement and increased provision of retail floorspace. As to this, the scheme consented pursuant to the Planning Permission would provide 3,693m² of new retail floorspace (comprising a net increase of 610m² on the existing provision), a small ground floor restaurant of 33m² and first floor restaurant of 320m² within the West Green Road/Seven Sisters district centre, which is identified for retail development pursuant to Policy 4.8 of the London Plan, Policy SP10 of the Strategic Policies and Policy SS5 of the draft Tottenham AAP. The principle of retail development of the Order Land is also established by the grant of the Planning Permission.
- 8.20 The retail component of the Development also accords with the requirement, pursuant to the NPPF, for local planning authorities to positively and proactively encourage economic growth (per paragraphs 19 and 21). In addition, siting retail uses within a district centre fully accords with the town-centre first approach promulgated by, Policies 2.15, 4.7 and 4.8 of the London Plan and Policy SP10 of the Strategic Policies and paragraph 24 of the NPPF.
- 8.21 In particular, the development consented pursuant to the Planning Permission proposes larger units for multiple retailers on the High Road frontage and smaller units for independent traders along the West Green Road and Seven Sisters Road frontages. As a result, redevelopment of the Order Land would generate an improved range and quality of retail outlets and, per paragraph 24 of the NPPF and the Development Brief, would promote the vitality and viability of the district centre. In accordance with Policy 4.9 of the London Plan, the S106 Agreement requires that Grainger is required to promote a marketing and letting strategy for the smaller retail units: (i) consistent with the promotion of West Green Road as a district centre with a focus on independent trading; and (ii) providing rents consistent with the rents paid for units of a similar size and nature in the vicinity of the Order Land.

- 8.22 So as to retain local traders and safeguard a range of retail units, the S106 Agreement also prevents: (i) the first retail unit being let to a person or organisation not currently trading within the Borough; and (ii) any of the smaller retail units being amalgamated otherwise than with the Council's prior approval.
- 8.23 In addition, the development consented pursuant to the Planning Permission secures (subject to conditions to ensure that it is provided for the benefit of the current traders and will be viable in the long term) the relocation and improvement of the Market on Seven Sisters Road, with its entrance in a prominent position on the corner of Tottenham High Road. Measures to prevent the loss of retail facilities, including street and farmers' markets, are encouraged by Policy 4.7 of the London Plan. In addition, retaining specialist shopping facilities is supported by Policy 4.8 of the London Plan. Pursuant to the S106 Agreement, a package of measures has been offered by Grainger to help to ensure the successful future of the Market (as to which see further below).

Design and Public Realm

- 8.24 The Development also presents an opportunity to provide a high quality design with bulk and massing in-keeping with the location and sympathetic to local surroundings in accordance with Policy 7.4 of the London Plan, Policy SP11 of the Strategic Policies and paragraph 58 of the NPPF
- 8.25 The Development would incorporate public realm that is accessible for all and would improve legibility throughout the Order Land in accordance with Policy 7.1 and Policy 7.5 of the London Plan. In particular, the development consented pursuant to the Planning Permission has incorporated 'Secure by Design' principles required by Policy 7.3 of the London Plan. As to this, the public square and podium landscaped spaces would be overlooked, thereby benefitting from passive surveillance.

Conservation

- 8.26 Part of the Order Land is located within the Conservation Area. Conservation area consent has been granted for the demolition of all existing buildings on the Order Land.
- 8.27 As to the impact of the demolition of the existing buildings on the Order Land on the significance of the Conservation Area, in its determination of the application for Conservation Area Consent, the Council considered that, whilst this would entail the loss of some architectural interest, it would not substantially harm the character and significance of the Conservation Area (per paragraph 133 of the NPPF). In particular, the Conservation Area is not characterised by a uniformity of style, quality or appearance and demolition would not undermine the essential contribution that Tottenham High Road and the associated street pattern and layout of the consented scheme makes to the character of the Conservation Area.

- 8.28 The Council is satisfied that any harm arising is less than substantial (per paragraph 134 of the NPPF), and, even attaching special weight to such harm, this is outweighed by the physical and economic regeneration of the Order Land at a density that secures its optimum viable use. Accordingly, the Development is in compliance with Policy SP12 of the Strategic Policies and section 12 of the NPPF.

Traffic and Parking

- 8.29 The Order Land is in a highly sustainable location with a PTAL rating of 6a and is well-located in relation to public transport with Seven Sisters Underground Station located to the front of the Order Land, Seven Sisters Overground Station located within a five minute walk and various bus routes on Tottenham High Road, which will all result in reduced need for car-use. In accordance with Policy 6.10 of the London Plan and the NPPF, the location of the Order Land facilitates access on foot, via safe and convenient direct routes to town centres and transport nodes.
- 8.30 In accordance with the policy imperative to reduce reliance on the private car in urban areas (per Policy 6.1 of the London Plan, Policy SP7 of the Strategic Policies and the NPPF), Grainger is required (pursuant to the S106 Agreement) to operate the residential component of the consented scheme in accordance with a travel plan approved by the Council and designed to secure a modal shift away from the private car.
- 8.31 The development consented pursuant to the Planning Permission also provides service covered storage for 234 cycle racks for the residential units and 11 cycle racks for the commercial units in line with London Plan standards, together with public cycle racks in the public square on Tottenham High Road near the entrances to the Seven Sisters Underground Station. In accordance with Policy 6.9 of the London Plan, the consented development provides secure, integrated and accessible parking facilities.
- 8.32 A limited number (44 including 3 spaces for people with disabilities) of car parking spaces to compensate for the loss of the existing 48 car parking spaces on the Order Land would be provided as part of the consented scheme. In accordance with Policy 6.13 of the London Plan, 20% of the spaces are to be fitted with electric vehicle charging points, with a further 20% having passive provision. The S106 Agreement secures that the consented scheme would be car-free (i.e. it prevents any occupier or residents from applying for a permit to park in a space within a controlled parking zone).
- 8.33 Moreover, the balance of uses proposed at the Order Land pursuant to the Development would encourage people to minimise journey lengths for employment, shopping and leisure activities (per paragraph 37 of the NPPF).
- 8.34 In light of the above, the Council is satisfied that the Development accords with the strategic objectives of the development plan and the national planning framework (as well as other material planning considerations).

(ii) The extent to which the Development would contribute to the achievement of the promotion and/or improvement of the economic well-being of the Council's area

- 8.35 Tottenham suffers from some of the highest levels of economic deprivation in the UK and sits within the 20% most deprived areas in London, ranked by reference to income, barriers to housing and services, health deprivation and disability¹³. The area has experienced a long period of relative decline moving from being a prosperous working suburb to one of high unemployment. The most recent employment and economic activity data available is from the ONS Annual Population Survey, for the 12 months to March 2015. This data is available at local authority level, and measures economic activity among the resident population aged 16 to 64. The economic activity rate in Haringey is 74.1%, below the figures for London (77.0%) and England (77.6%).
- 8.36 Census data for employment and economic activity is available at LSOA and ward level, and measures economic activity among the resident population aged 16 to 74. In Haringey 025D, the level of economic activity is 62.6%, being considerably below average for the London-wide rate of 71.7%. Economic activity in Tottenham Green Ward again falls well short of the London-wide average, being 68.1%.
- 8.37 Unemployment is higher than the Haringey, London and England average across both LSOAs and Tottenham Green. In Haringey 024B, 9.1% of residents aged 16-74 are unemployed, more than double the national rate (4.4%) and considerably higher than the rate across Haringey (6.1%) and London (5.2%), in Haringey 025D it is 6.0% which is more in keeping with the Borough average. Long-term unemployment is also high, at 3.3% in Haringey 024B and 2.2% in Haringey 025D, compared with 1.3% across the borough and 1.0% across London. In April 2015, 3.7% of working age people in the Tottenham Green Ward received Job Seeker's Allowance, which is in excess of both the borough and national average.
- 8.38 Within this context, there is a compelling need to regenerate this part of Tottenham. Indeed, the case for addressing this significant issue is overwhelming and the Council's regeneration programme – with which the Development would be entirely consistent – is focused on doing so. In addition, the Development presents an opportunity for Grainger and the Council to work with local agencies to improve job prospects for local people in accordance with the objectives of the Council's planning policies.
- 8.39 The Development would act as a catalyst for the wider regeneration and investment in this part of the borough. It would bring additional life, vibrancy, a substantial number of jobs, homes and a transformed street environment to a key gateway in Tottenham, consistent with adopted, national and emerging policy (as set out above). A number of

¹³ According to the Index of Multiple Deprivation (IMD) Decile in the English indices of deprivation 2015, published on 30th September 2015 by the Department for Communities and Local Government.

economic benefits can be directly attributed to the development consented pursuant to the Planning Permission including¹⁴:

- (a) 360 jobs directly involved in its construction (with 720 person-years of temporary construction employment over the 2 year period of construction); and
- (b) 160 jobs (FTE) operational jobs supported by new employment space, which represents significant net additional employment.

8.40 A number of indirect economic benefits would also arise from the Development. As regards the development permitted pursuant to the Planning Permission, these are estimated to include¹⁵:

- (a) 545 jobs indirectly created or induced by its construction;
- (b) 70 (FTE) operational jobs;
- (c) £2.1 million increase in annual net resident expenditure within local shops or services; and
- (d) 15 new operational jobs created by this additional resident expenditure in the local area.

8.41 This delivery of new jobs is underpinned by a legal commitment from Grainger to secure local training and employment benefits (per the S106 Agreement). In particular, the S106 Agreement obliges Grainger to:

- (a) *ensure that the recruitment, employment, training and career development of all contractors and occupiers of the consented scheme reflect the principles and objectives of the Haringey Guarantee Programme;*
- (b) *liaise with both the Council and local employment training agencies to identify job opportunities and skill needs within the consented scheme (and to procure that contractors enter into equivalent liaison arrangements);*
- (c) *use reasonable endeavours to procure that its contractors target the offer of employment to 20 individuals who live in Tottenham on an apprentice basis throughout the construction of the consented scheme, and to liaise with the College of Haringey to secure such offers;*
- (d) *work with the Council to employ measures that aim to secure that all new jobs within the consented scheme (both during construction and following occupation) are made available in the first instance to residents of the Council's borough, and to agree with the Council a mechanism for advertising such jobs;*

¹⁴ According to a report by Nathaniel Lichfield & Partners, Seven Sisters Regeneration Project Economic Benefits Assessment dated October 2015.

¹⁵ According to a report by Nathaniel Lichfield & Partners, Seven Sisters Regeneration Project Economic Benefits Assessment dated October 2015.

- (e) *work with the Council to support measures that promote Tottenham as an area for business;*
 - (f) *advertise supply chain opportunities arising from the consented scheme to local businesses; and*
 - (g) *submit an annual statement to the Council evidencing how these commitments have been satisfied.*
- 8.42 Overall, it is estimated that the development pursuant to the Planning Permission would deliver an investment of around £65m in this part of the borough¹⁶. Upon first occupation, it is anticipated that £980,000¹⁷ would be spent on goods and services by those moving into the new homes. A high proportion of this spend would be captured locally and would provide an economic stimulus for other business in the area and increase the likelihood of future investment into the Seven Sisters area.
- 8.43 The proposed redevelopment and re-provision of the Market would deliver a new and improved market for the local area, with a number of commitments made by Grainger in the S106 Agreement to provide support to market traders to relocate either within the re-provided market space or elsewhere as they might prefer. The re-provided market (itself being a significant benefit) would be complemented by additional, new retail floor space at ground floor level, helping to diversify the range of retail available in the Seven Sisters/West Green Road district centre which has been identified as important to the continuing success and future development of this specific centre, while retaining the existing retail character in the area, particularly along West Green Road¹⁸.
- 8.44 In this context, it is also important to note that the S106 Agreement requires Grainger to:
- (a) *promote a marketing and letting strategy for the proposed retail units which is consistent with the promotion of West Green Road as a district centre with a focus on independent trading;*
 - (b) *provide rents which are consistent with those being paid for units of a similar size and nature in the vicinity of the Order Land;*
 - (c) *pay £144,300 to the Council prior to the closure of the Market, which is to be paid to individual traders to facilitate their relocation to the temporary/new market;*
 - (d) *offer to existing traders the right to take either a lease or a licence of a stall in the new market area (of an equivalent size to their existing stall) at:*
 - (1) *a rent/licence fee which equates to a discount of 30% less than open market valuation of their stall for the first 18 months; and*

¹⁶ According to a report by Nathaniel Lichfield & Partners, Seven Sisters Regeneration Project Economic Benefits Assessment dated October 2015.

¹⁷ According to a report by Nathaniel Lichfield & Partners, Seven Sisters Regeneration Project Economic Benefits Assessment dated October 2015.

¹⁸ Tottenham Retail Study, August 2012 carried out by Jones Lang LaSalle

- (2) *subsequently, at open market value;*
- (e) *consult with traders about the internal layout of the new market area;*
- (f) *not permanently close the existing market unless and until a temporary market has been provided and is ready for occupation;*
- (g) *appoint a market facilitator to work with existing traders in order to (amongst other things) identify a location for the temporary market, promote the interest of Spanish-speaking traders and provide all appropriate business support and advice with the objective of maximising the number of existing traders who elect to return to the new market, and to assist traders in finding suitable alternative employment if they decide not to relocate; and*
- (h) *offer each existing trader a stall in the temporary market and a 3 month rent free period in respect of it.*

8.45 It is clear, therefore, that the S106 Agreement is intended to support the existing businesses and tenants to remain and thrive as part of the redeveloped Order Land, while helping to improve the district centre's competitive retail offer by increasing footfall and trading levels in the area. Additional to the obligations secured through the S106 Agreement, is a commitment from the Mayor of London to enter into arrangements with the London Borough of Haringey to provide financial support to the small businesses in the existing market during the regeneration period. This is expressly to support the Latin American market. The Mayor of London has delegated to TfL to enter into this agreement with the Council to provide £284,500 to assist in resourcing the temporary relocation of Seven Sisters market following its temporary closure as planned to allow for the regeneration of Wards Corner.

8.46 Retail and town centres studies¹⁹ have found that a diverse retail offer is needed in the Seven Sisters/West Green district centre. The location and scale of the Order Land offers an opportunity to deliver this retail offer consistent with the town centre policies of the development plan. Indeed, the Development is central to the vitality of the district centre, which faces competition from retail providers at the nearby Bruce Grove/ High Road district centre and the district centre at Tottenham Hale, the latter of which is home to a number of big retailers.

8.47 The Council is satisfied that the Development would contribute towards the improvement and promotion of the economic well-being of its area.

(iii) The extent to which the Development would contribute to the achievement of the promotion and/or improvement of the social well-being of the Council's area

8.48 In addition to the undoubted economic benefits of the Development, it is acknowledged that the opportunities presented by the Development would equally create social gains

¹⁹ Tottenham Retail Study, August 2012 carried out by Jones Lang LaSalle and Retail and Town Centres Study, 2013 by NLP.

for local people and businesses and contribute towards the promotion and improvement of social well-being in the Council's area. It is also acknowledged that the economic benefits listed above and the environmental benefits listed below will improve the social well-being of the Council's area, for example creating jobs and an attractive environment will also indirectly enhance the social well being of people in the area.

- 8.49 The provision of housing pursuant to the Development would contribute towards the improvement of social well-being in the Council's area. As to this, there is a pressing need for new housing in Haringey, as in the rest of London, given high levels of population growth. In particular, Seven Sisters has low levels of home ownership, as well as a significant demand for new housing. Both Haringey 024B and Haringey 025D have notably low rates of home ownership. 24.0% of households in Haringey 024B and 28.4% in Haringey 025D are owner-occupied, compared with 39.8% across Haringey, 48.3% across London, and 63.3% nationally. As a result of historic housing need and land availability, large housing estates owned by the Council were built in Tottenham in the 1960s. Now, over 58% of the Council's total housing stock (rented and leasehold) is in Tottenham. As a result, high proportions of low income and vulnerable households live within this part of the borough.
- 8.50 The Development would deliver a range of new homes, built in accordance with relevant housing standards. Indeed, the development consented pursuant to the Planning Permission would deliver 196 new homes with a range of 1-3 bed units, built to relevant housing standards. The homes would contribute to the delivery of much needed housing in Haringey and, more generally, London. Overall, the development permitted pursuant to the Planning Permission would result in a net increase of 150 homes on the Order Land. The new housing for sale would help to diversify the housing stock available in the area and provide new opportunities for owner-occupiers. The S106 Agreement also requires Grainger to ensure that local residents are targeted via its letting strategy for residential units to ensure the benefits of the provision of new housing are harnessed within the borough.
- 8.51 In addition, the S106 Agreement secures the following in respect of the development consented pursuant to the Planning Permission:
- (a) *no less than 10% of the new homes shall be wheelchair accessible units; and*
 - (b) *the residential units must be designed in accordance with Lifetime Homes Standards.*
- 8.52 The above initiatives would secure the delivery of a significant and tangible improvement in the housing stock within this part of the borough. These benefits are significant and compelling, particularly when complemented by the commercial uses, which together would deliver (and encourage further) investment in this part of Tottenham to the benefit of local people and businesses.

8.53 To ensure that the consented scheme does deliver positive social benefits to the local area, the Council is required to approve (and Grainger is to subsequently implement) a community engagement strategy in respect of the scheme to demonstrate how the following have been addressed:

- (a) *regular diversity monitoring regarding the impact of the consented development on affected third parties;*
- (b) *reporting on the engagement process and how representations from third party stakeholders will be taken into account; and*
- (c) *any further mitigation measures that are identified as a result of ongoing monitoring and which are both necessary and directly related to the development permitted pursuant to the Planning Permission.*

8.54 Further, central to the redevelopment of the Order Land is the retention and improvement (subject to conditions) of the Market. In addition, to ensuring specialist shopping facilities are provided for local residents and providing an opportunity for members of the community to meet, the Market would provide a venue for local and diverse businesses to trade.

8.55 A package of measures is secured pursuant to the S106 Agreement in order to enhance the environment for local people and local businesses, including existing traders working within the Market. In short, the S106 Agreement ensures financial assistance to traders to facilitate their relocation to the new market (or a temporary market should the new market not yet be ready for occupation), in respect of which they are offered a stall of a comparable size to their existing stall, which is subject to a discounted licence fee or rent (as the case may be).

8.56 In addition, the S106 Agreement also ensures that the re-provision of the Market is a collaborative effort with the traders, whose views will be considered when: (i) identifying a suitable location for the temporary market; and (ii) designing the layout of the market, so as to ensure their operational needs are satisfied (see paragraphs 8.42 – 8.43).

8.57 The S106 Agreement also places an obligation on Grainger to promote the interests of Spanish-speaking traders and to provide business support and advice to existing traders with the objective of seeking to retain all of the existing traders as part of the regeneration scheme (see paragraphs 8.42 – 8.43). Accordingly, enhancing the Market (as part of the wholesale regeneration of the Order Land) is a tangible benefit, which would improve the social well-being of businesses, traders, customers, residents and visitors to the Council's area.

8.58 The Council is satisfied that the Development would contribute towards the promotion and improvement of the social well-being of its area.

(iv) The extent to which the Development would contribute to the achievement of the promotion and/or improvement of the environmental well-being of the Council's area

- 8.59 The Order Land is in a prominent location, where the Seven Sisters Road meets the High Road, and at a significant transport interchange for the Victoria Line, the Overground and a number of bus routes. The Cycle Super Highway route has recently been extended through the Order Land, which is also identified as a potential site for a station on the Crossrail 2 line. While this makes it an important gateway site into Tottenham, it is also a very busy place, with strategic roads on two sides creating a potentially hostile environment.
- 8.60 There has been historically a lack of investment in the building stock along the High Road. In addition, the Order Land is presently located in a poor quality environment, characterised by clutter, a lack of quality public spaces and poor sense of destination. The public realm in front of the Order Land is tired and a number of vacant units front onto the main space around the Seven Sisters station, which makes the area feel unattractive and unsafe. As to this, the Seven Sisters area records a higher crime rate than the average for Haringey and London. Statistics for the area show a comparatively high crime rate in Haringey 024B in July 2015 of 23.75, compared with 12.41 in Tottenham Green and 8.99 across Haringey. The crime rate in Haringey 025D was 10.17, still above the average for Haringey. The Order Land, therefore, presents a real opportunity to secure an upgrade to the environment of the local area.
- 8.61 The Development would provide high quality and inclusive design, which (as above) also seeks to address the connections between people and places and would integrate well into the natural, built and historic environment (per paragraph 61 of the NPPF). Indeed, the Development would make effective use of the Order Land and secure improvements to the living and working environment of existing and proposed occupiers. In addition, the Development would upgrade both the Seven Sisters and High Road frontages, creating a high quality landmark feature presently lacking in this part of Tottenham.
- 8.62 The proposed mix of retail and residential uses for the Order Land together with improvements to the transport interchange and public realm would bring vibrancy to the area and give rise to additional footfall that would serve to encourage the economic and physical regeneration process to extend along Seven Sisters Road and High Road. In addition, the development consented pursuant to the Planning Permission is sensitively designed having regard to the Conservation Area, whilst engaging with the bustling character of the High Road and preserving the legacy of the Wards Corner Building.
- 8.63 The Development would also provide an opportunity to comprehensively redevelop the public realm around the entirety of the Order Land, creating a consistent streetscape design, together with attractive public space around Seven Sisters station, being the

entrance point for many people into Tottenham. This would create a new focal point for the community, with the benefits of a mixed use development overlooking public space, which would improve the perception, and potentially the reality, of the risk of crime in the area.

8.64 Consistent with this, the Development would also deliver improvements to shop/building frontages and other environmental improvements within the vicinity of the Order Land so as to enhance the overall appearance of West Green Road and its important role as a district centre within the retail hierarchy. In this respect, it is important to note that the S106 Agreement ensures:

- (a) *the undertaking of public realm works to the entrance of Seven Sisters Underground Station; and*
- (b) *a payment of £150,000 to the Council to be used towards any or all of:*
 - (1) *improvements to shop/building frontages in the vicinity;*
 - (2) *street decoration and enhancements in the vicinity;*
 - (3) *improvements to servicing arrangements in relation to retail properties situated on West Green Road;*
 - (4) *improvements to local businesses/markets, open spaces and areas of existing and future car parking; and*
 - (5) *such other environmental improvements in the vicinity as may be agreed with the Council.*

8.65 These initiatives would secure a safe environment for future and existing residents and businesses; and are consistent with national and development plan policy.

8.66 In order to ensure that the environmental effects of the consented scheme are managed effectively, the S106 Agreement secures the implementation of a travel plan, provision of replacement bus stops and improvements to footways on West Green Road and Suffield Road, all of which would enhance connectivity to and from the Order Land and promote the use of public transport or walking in preference to the private car. Siting regenerative development at the Order Land would, therefore, make effective use of the already available public transport infrastructure.

8.67 The development consented pursuant to the Planning Permission has itself been designed to minimise its impacts on the environment and employ a sustainable energy strategy. The Planning Permission has an energy strategy assessed to be in line with the London Plan.

8.68 Overall, the Council is satisfied that the Development would deliver weighty and compelling public benefits, which would significantly enhance this part of the borough, in line with the Council's regenerative objectives and planning policy generally.

8.69 The economic, social and environmental benefits of the Development are substantial. Accordingly, the requirement (per the Guidance) that a compulsory purchase order should only be made where *'there is a compelling case in the public interest'* has been proven.

(v) Whether the purposes for which the proposed Order Land is to be acquired could reasonably be achieved by any other means within a reasonable timeframe

8.70 The purpose for which the Order Land is proposed to be acquired is entirely in accordance with the applicable planning policy framework. The Planning Permission and the Development Agreement envisage comprehensive redevelopment in accordance with that framework.

8.71 It is not accepted that there exists a suitable alternative for the purposes of delivering the Development. Moreover, and as has been foreshadowed, the social, economic and environmental benefits which would accrue as a result of the Development are specific to the location and context of the Order Land.

8.72 The only alternative proposal that has been advanced in respect of the Order Land relates to the Wards Corner Building and 231-243 High Road, further to a proposal tabled on behalf of the Wards Corner Community Coalition, which has for some time objected to the development consented pursuant to the Planning Permission principally on the basis of scale and its alleged impact on the Wards Corner Building. Its own proposal was granted planning permission by the Council on 25 April 2014 (Ref. No. HGY/2014/0575) ('the Coalition Scheme'). The Coalition Scheme proposes the retention and refurbishment of the Wards Corner Building and the adjoining properties for continued retail use and specifically for the Market at ground floor.

8.73 As such, the central focus of the Coalition Scheme is to enable retention of the Market. In fact, the objective of the Wards Corner Community Coalition is *'to hold on to their market, their local businesses, their meeting spaces, the buildings they cherished and improve the area by building on the vibrant and multi-cultural character of Seven Sisters.'*²⁰ However, this is also a key objective of the Council and Grainger (per the Development and, in particular, the measures secured pursuant to the S106 Agreement). In addition, the Council is satisfied that the Development represents a far more (and the only credible) comprehensive solution to redeveloping and regenerating the Order Land and adjoining land.

8.74 Further, there is no evidence to suggest that there is a reasonable prospect of the Coalition Scheme being delivered, having regard to the need for funding. In any event, even if it were to be demonstrated that the Coalition Scheme could come forward, the refurbishment of the existing ground floor Market would not provide the

²⁰ Source: Wards Corner Community Coalition website

comprehensive redevelopment of the Order Land (per the Development), which is demanded by extant planning policy. Without this scale of development, it would not be possible to achieve the compelling economic, social and environmental benefits associated with the regenerative mix of uses and environmental improvements proposed pursuant to the Development.

- 8.75 The Council has carefully considered whether redevelopment in accordance with planning policy objectives can be achieved without acquiring the ownership of the entire Order Land (i.e. the Development could come forward in parcels). However, in light of the comprehensive nature and scale of the Development and the public realm scheme, which would cross land in multiple ownerships and require the co-operation of various landowners and occupiers, it is not considered practicable.
- 8.76 The Council is satisfied that the optimum (and compelling) course is the comprehensive redevelopment of the Order Land. Given that it has been proven that some properties cannot be acquired through agreement, it is therefore considered that compulsory acquisition of the entire Order Land is required in order to most effectively deliver the high number and quality of residential units for which the Order Land has capacity.
- 8.77 In light of the above, the Council is satisfied that there exists no credible alternatives to the Development which could viably meet the established planning policy objectives for the Order Land.

9 LOCAL ENGAGEMENT

- 9.1 Over a period of years there has been a great deal of engagement with local people as to the proposed redevelopment of the Order Land. In addition to the 'Statement of Consultation' submitted with the planning application underlying the Planning Permission, details of further engagement by Grainger is summarised at Appendix [D] to this Statement of Reasons.
- 9.2 Grainger is committed to continuing its efforts to ensure local people are fully informed as to the progress of the Development and the compulsory purchase process. As to this, during the compulsory purchase process, it has continued to engage with affected property owners, lessees and other interested parties within the community by:
- (a) Hosting further 'drop-in' events;
 - (b) Issuing quarterly newsletters and e-newsletters to approximately 9,000 properties and businesses within the local area with updates on the progress of the redevelopment proposals; and
 - (c) Updating the project website with regular news/updates as available.

- 9.3 The Council and Grainger have jointly issued a newsletter, the purpose of which is to keep the community informed of process on the Seven Sisters Regeneration project. The newsletter was sent in June 2015 to approximately 9000 properties, including businesses and residential homes. A copy can be found on the Seven Sisters Regeneration website (www.sevensistersregeneration.co.uk).
- 9.4 The Council have undertaken several public consultations on the redevelopment of the Order Land and the regeneration of the Seven Sisters area, including:
- All of the documents in the planning policy framework or forming the regeneration strategy for the Order Land and the Seven Sisters area have been through at least one stage of public consultation, including the OAPF and the Development Brief.
 - Council-led consultation for the planning application submitted by Grainger (which when granted constituted the Planning Permission). This consultation complied with the statutory 21 days period which is required for all planning applications. The scheme was presented to a Development Management Forum on the 30th May 2012, which was attended by approximately 230 local people and businesses, and was also presented to the Haringey Design Panel on the 31st May 2012. Responses received at both of these events were considered as part of the Wards Corner Officers Report for Planning Committee on 25th June 2012.
 - The emerging Tottenham Area Action Plan (AAP), which includes the Seven Sisters area and specifically allocates the Order Land for redevelopment, has been subject to consultation. A period of public consultation was held on the Preferred Options Draft Tottenham AAP from 9th February 2015 to 27th March 2015. The responses received through the consultation have been considered and have informed the Tottenham AAP Publication Draft, on which there will be further public consultation and an Examination in Public.
 - A consultation under section 105 of the Housing Act 1985 in compliance with its statutory duty to “consult its secure tenants on ‘matters of housing management’ such as changes to the management, maintenance, improvement or demolition of houses let by them, or changes in the provision of amenities”. This consultation ran for four weeks in October and November 2015 and relevant Council officers met with the affected tenant(s) and will continue to meet with them to assess needs and alternative accommodation if necessary.

10 LAND ACQUISITION

10.1 Paragraph 2 of the Guidance states:

‘The confirming authority will expect the acquiring authority to demonstrate that they have taken reasonable steps to acquire all of the land and rights included in the Order by agreement...Compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects. However, if an acquiring authority waits for negotiations to break down before starting the compulsory purchase process, valuable time will be lost. Therefore, depending on when the land is required, it may often be sensible, given the amount of time required to complete the compulsory purchase process, for the acquiring authority to:

- *plan a compulsory purchase timetable as a contingency measure; and*
- *initiate formal procedures*

10.2 *This will also help to make the seriousness of the authority’s intentions clear from the outset, which in turn might encourage those whose land is affected to enter more readily into meaningful negotiations.’*

10.3 As above, the Council considers that: (i) the Order Land needs to be in single ownership in order to enable the Development to be delivered; and (ii) it is unlikely that Grainger will be able to acquire all of the interests in the Order Land by private agreement in a reasonable timescale. This being so, it is satisfied that the use of its compulsory purchase powers is necessary and proportionate.

10.4 Grainger has already assembled approximately 34% (comprising parcels 1, 3, 9, 10, 12, 18, 19, 20, 23, 26 and 29) of the interests in the Order Land by private treaty. Approximately a further 9% (comprising parcels 4, 13, 16 and 17) of the interests in the Order Land are owned by the Council (as landowner). Grainger is seeking to acquire the remaining interests by agreement, as to which see further below.

10.5 Grainger has approached all those with an interest in the Order Land and has provided the following summary as to its progress regarding the remaining commercial and residential interests by reference to the parcels of land identified on the Order Plan:

High Road

10.6 Grainger is in active negotiations in respect of the freehold and leasehold interests of the retail premises and six flats above at 255 – 259 High Road (parcel 28 per the Order Plan).

Seven Sisters Road

10.7 Grainger is in active negotiations in respect of the:

- (a) freehold interest of the bistro at 711/711A Seven Sisters Road (parcel 5 per the Order Plan)

- (b) freehold interest of the store and three flats at 717 - 719 Seven Sisters Road (parcel 2 per the Order Plan) and
- (c) leasehold interest at 709B Seven Sisters Road (part of parcel 6 per the Order Plan).

10.8 Grainger and the Council have attempted to contact the leaseholder of 709A Seven Sisters Road (being part of parcel 6 per the Order Plan), but have so far been unsuccessful in attempts to open negotiations. The freehold interest is owned by NDPT.

Suffield Road

10.9 Grainger is in active negotiations in respect of the:

- (d) freehold interest of two flats at 28 Suffield Road including the parking bay and part of the highway (parcel 21 per the Order Plan); and
- (e) freehold interest of the house at 30 Suffield Road including part of the highway (parcel 22 per the Order Plan).

10.10 Grainger has engaged in repeated discussions with the freehold owners of the houses at 14 Suffield Road including parking bay and part of the highway (parcel 14 per the Order Plan) and 16 Suffield Road including parking bay and part of the highway (parcel 15 per the Order Plan), respectively.

10.11 Grainger and the Council have attempted to contact the freeholder of the residential interest at 8 Suffield Road including parking bay and part of the highway (parcel 11 per the Order Plan).

West Green Road

10.12 Grainger is in active negotiations in respect of the:

- (f) freehold interest of retail premises at 1A & 1B West Green Road (parcel 27 per the Order Plan);
- (g) the leasehold interest at 3 – 7 West Green Road (part of parcel 25 per the Order Plan) in respect of the basement and ground floor belonging to Sainsbury's Supermarkets Limited.; and
- (h) the freehold and leasehold interests at 9 – 11 West Green Road (parcel 24 per the Order Plan) comprising Tropical Foods and Fair Deal Cash & Carry, together with residential premises above. Meetings have been held with the leaseholder.

10.13 Grainger and the Council have attempted to contact (including on 12 November 2014, 7 January 2015, 2 February 2015 and 6 July 2015) the freeholder of 3 – 7 West Green Road.

The Market

- 10.14 As to the Market at 227-237 High Road (parcel 32 per the Order Plan), Grainger is in active discussions with LUL regarding the acquisition of this interest. The existing lease of the Market to Market Asset Management Seven Sisters Limited ('MAM') expired on 16 September 2015, as to which discussions with LUL are ongoing.

Other LUL Interests

- 10.15 Discussions with LUL are ongoing regarding the acquisition of its interests in the Order Land (comprising parcels 7, 8, 30 and 31).

Business Occupiers

- 10.16 Grainger continues to work with business owners to identify suitable premises for their possible relocation and *will continue to support* businesses so that they may plan a timely transfer of their business activities as required in line with the programme of Development.

Residential Occupiers

- 10.17 Grainger and the Council are working together to keep residential properties occupied for as long as possible before it is necessary to secure vacant possession ahead of delivery of the Development. Support will be provided to any occupiers who remain in occupation during the lead up to the commencement of the Development so that suitable rehousing can be identified and secured in advance of the termination of any tenancies.
- 10.18 Grainger will continue to seek to acquire the interests set out above by agreement with the assistance, as necessary, of the Council. However, the Council considers that it is unlikely that it will be possible to achieve the assembly of the entirety of the Order Land by agreement within a reasonable timescale without the use of its compulsory purchase powers and the Development cannot proceed unless those interests have been acquired.
- 10.19 The Council is satisfied that acquisition of the remaining interests in the Order Land would facilitate the regeneration of the Order Land and that there is a compelling case to do so given the significant improvements in the economic, social and environmental well-being of its area that would arise as a consequence.

11 SCHEME DELIVERY

- 11.1 The Guidance in Paragraph 13 highlights that it will be difficult to show conclusively that compulsory acquisition is justified in the public interest at the time of its making if the local authority has not considered: (i) how it intends to use the land which it is

proposing to acquire; and (ii) cannot show that all the necessary resources are likely to be available to achieve that end within a reasonable time-scale.

- 11.2 For the reasons set out at below at paragraphs 11.5 – 11.10, the Council is satisfied that the Development has a reasonable prospect of being delivered and for the reasons set out at paragraph 11.11 – 11.14 below, the Council is satisfied that adequate funding is available not only to complete the assembly of the Order Land but to implement (and complete) the Development.
- 11.3 As above, in order to guide the delivery of the Development, the Development Agreement was entered into.
- 11.4 The Development Agreement is subject to conditions, of which the following are to be satisfied:
- a) site assembly (including securing agreement with LUL on development rights);
 - b) scheme viability;
 - c) funding; and
 - d) approval to related traffic orders,

as to which see further below.

The site assembly condition requires: (i) Grainger to complete the acquisition and/or exchange unconditional agreements for the acquisition of such third party properties/interests and/or any consent, waiver or approval in respect of any interests as are necessary to enable the development permitted pursuant to the Planning Permission to be carried out; and (ii) the Order to be confirmed (and a general vesting declaration being made) in respect of those properties/interests which Grainger has been unable to acquire by private agreement. The Council has set out above (see paragraphs 10.1 – 10.19) details of the extent of the freehold and leasehold interests that have been acquired to date and those remaining to be acquired.

- 11.5 Related to this, Grainger is also required under the Development Agreement to enter into an agreement with LUL, pursuant to which LUL grants development rights and a 150 year lease (or longer) of LUL airspace to Grainger so as to enable the Development to be carried out. As noted above (see paragraphs 10.14 – 10.15), Grainger is continuing negotiations with LUL regarding the acquisition of its interest.
- 11.6 Included within the LUL ownership is the Market, which has been added to the Council's list of ACVs pursuant to Part 5 of Chapter 3 of the Localism Act 2011 ("the Localism Act") and the Assets of Community Value (England) Regulations 2012 ("the Regulations"). By virtue of its registration as an ACV, the owner (LUL) is prohibited from making a relevant disposal of the Market (being the sale or lease of the Property for a term of least 25 years left to run) unless specific requirements are satisfied as set out in the Localism Act.

- 11.7 A part-listed disposal as specified in section 98(5)(e) of the Localism Act must (in respect of the land (including part of a building or part of any other structure (per section 108(1) of the Act)) being disposed of) satisfy the following requirements (per paragraph 11(1) of schedule 3 to the Regulations):
- (a) the land is owned by a single owner; and
 - (b) every part of the land can be reached from every other part without having to cross land which is not owned by that single owner.'
- 11.8 An exemption may apply to this particular ACV (in accordance with section 95(5)(e) relating to part-listed disposal). This is because LUL will be disposing of the entirety of the Wards Corner Building, together with a parcel of land that fronts Suffield Road to Grainger (i.e. the Market, being a listed ACV, would only form part of the disposal) and LUL, as owner of the asset, will have to assess what is the correct procedure that it should follow to comply with the legislation. If it is the case that an exemption does apply here, the owner would not be required to notify the local authority or comply with either of the moratorium periods. Should the six week interim moratorium period apply, then in this period a community interest group may register interest to be considered as a potential bidder. This would then trigger the full six month moratorium period, during which the owner may not sell to anyone other than a community interest group. However this would not prevent LUL from negotiating with Grainger with a view to selling the ACV to Grainger. Once the moratorium period is completed, the owner is free to sell the asset to whomever it chooses and a bid from a community interest group will receive no preference. Accordingly it is not considered that the listing of the Market as an ACV would frustrate LUL's ability to dispose of its interest to Grainger in a timely manner.
- 11.9 The viability condition requires Grainger to be reasonably satisfied that the Development would yield a satisfactory net profit by reference to a viability appraisal. This condition is to be satisfied after the site assembly condition has been complied with (as above). In any event, Grainger is satisfied that the Development is viable and deliverable.
- 11.10 The funding condition requires Grainger to have secured funding in respect of the Development and compliance with Grainger's obligations pursuant to the Development Agreement. The Development would be carried out by Grainger, which is a wholly owned subsidiary of Grainger Plc. Grainger's obligations in the Development Agreement are underwritten by Northumberland and Durham Property Trust Limited ('NDPT'), being another wholly owned subsidiary of Grainger Plc.
- 11.11 Grainger Plc is a leading residential developer and the largest listed specialist residential landlord and property manager in the United Kingdom. It owns a significant portfolio of residential property assets across the United Kingdom and Germany totalling approximately £2 billion and manages approximately 20,000 properties worth

around £3.2 billion on its own behalf and for its investors and partners (as at 30 September 2014). Its assets provide strong sales and rental income and have shown a period of further growth throughout 2014. Its profit before tax in 2014 was £81.1 million²¹.

- 11.12 As to development, Grainger Plc has significant experience assembling residential and mixed-use developments, particularly in London. Grainger Plc's expertise and the scale of its assets and operations enable it to generate sustainable income streams.
- 11.13 Sufficient evidence of Grainger Plc's financial capacity has been provided to the Council by way of the annual statement of accounts of NDPT. In addition, NDPT has provided a letter from its Chairman addressed to the Council (20 October 2015) confirming Grainger Plc's commitment to progress the Development in line with a specified delivery timetable (if the Order is confirmed) together with details of Grainger Plc's history of delivering similar mixed-use schemes of comparable size and complexity.
- 11.14 The stopping-up condition requires Grainger to have secured the appropriate orders for the closure of roads, footpaths and public highways as required to deliver the Development. An application for the stopping-up of part of Suffield Road pursuant to section 247 of the Act, in respect of the development consented pursuant to the Planning Permission, is currently being prepared by Grainger. The Stopping-up Order Plan can be seen at Appendix (K).

Impediments to Development

- 11.15 The Council is satisfied that: (i) there are no impediments to the Development proceeding; and (ii) the Development (to be delivered through the acquisition of the Order Land) accords with planning policy as set out in (amongst other things) the statutory development plan and the NPPF (as well as emerging policy); and (iii) the Development would deliver the Council's objectives for this part of Tottenham.

12 SPECIAL CONSIDERATIONS

- 12.1 As has been stated, part of the Order Land is in the Conservation Area (designated on 13 July 1998) forming part of the Tottenham High Road Historic Corridor. As to the development consented pursuant to the Planning Permission, the Council fully assessed its likely impact on the Conservation Area as a whole (being a designated heritage asset within the meaning of the NPPF) and concluded (by reference to expert heritage evidence) that any harm arising is: less than substantial; and outweighed by

²¹ Grainger Plc, Annual Report 2014

the substantial public benefits which accrue, to which the Council has referred above. In so concluding, the Council has attached considerable weight to this identified harm and to the desirability of preserving the Conservation Area pursuant to its statutory duty in section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 11.1 Overall, the Council is satisfied that less than substantial harm (per paragraph 134 of the NPPF) exists but this is outweighed by the public benefits arising from the making of the Order (and, subsequently, implementing (and completing) the Development).

13 VIEWS EXPRESSED BY GOVERNMENT DEPARTMENTS

- 13.1 No views have been expressed by government departments.

14 ADDITIONAL INFORMATION

it is considered that a number of properties around the Order Land have or may have rights of light over it, and the occupiers of those properties have been regarded as potentially having qualifying interests, under section 12 (2A) and therefore are included within Table 2 of the Schedule of Interests at Appendix B.

15 RELATED ORDERS

- 15.1 Part of Suffield Road would need to be extinguished for the development granted consent pursuant to the Planning Permission to proceed (as shown on drawing number (1411/170/010) at Appendix (K)). This is proposed to be secured via a stopping-up order under section 247 of Act. An application is being progressed by Grainger.

16 HUMAN RIGHTS

- 16.1 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights ('ECHR'). There are various Convention rights which may be at issue in the course of the making and leading up to the confirmation or non-confirmation of the Order; in particular, Articles 6 and 8 and Article 1 of the First Protocol appear to be relevant. There has been considerable public consultation on the proposals to regenerate the Order Land, and much opportunity has been given throughout the planning process for interested third parties to make representations.
- 16.2 In any case, the Council is satisfied that the statutory compulsory purchase process provides for the consideration of objections and, if duly made objections are made, for a public inquiry to be convened into the Order, all of which complies with the requirements of Article 6.

- 16.3 Article 8 provides that everyone has the right to respect for his private and family life and that there shall be no interference by a public authority with the exercise of this right except in accordance with the law, where there is a legitimate aim and where it is fair and proportionate in the public interest. The Council is satisfied that any interference caused by the Order would fall within these exceptions having regard to the substantial and compelling public benefit which would accrue from the Development.
- 16.4 Article 1 of the First Protocol provides for the peaceful enjoyment of possessions (including property) and that no one shall be deprived of possessions except in the public interest and as provided by law. The Council is satisfied that the Order will strike a fair balance between the private loss of property and the public interest in securing the implementation of the Development.
- 16.5 It is not considered that the Development and the Order would infringe rights under the ECHR.
- 16.6 Overall, the Council is satisfied that the use of its powers of compulsory acquisition pursuant to section 226(1)(a) of the Act is proportionate.

17 EQUALITIES IMPACT ASSESSMENT

- 17.1 The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender re-assignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. Pursuant to section 149 of the Equality Act 2010, the Council is subject to the Public Sector Equality Duty, which requires the Council, in the exercise of its public functions, to have due regard to the need to:
- (a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act;
 - (b) advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - (c) foster good relations between people who share a protected characteristic and those who do not.
- 17.2 A full Equalities Impact Assessment ('EQIA') was commissioned by the Council in 2012 as part of its consideration of the planning application that gave rise to the Planning Permission. That EQIA demonstrated overall that:

'the planning application proposal is unlikely to give rise to major negative equality impacts provided all the measures set out in the S106 agreement are honoured in full and in a timely manner, as well as other recommended mitigation measures set out in this report.'

17.3 The Council notes that the relevant legislative context is unchanged since the EQIA was produced. However, a separate EQIA has been commissioned by the Council to assess the impacts of making the Order. This assessment, the Wards Corner CPO EQIA, commissioned by the Council (and prepared by AECOM in September 2015) has considered how the exercise of the Council's compulsory purchase powers would impact upon affected people with protected characteristics, taking into account any agreed mitigation. A copy of the Wards Corner CPO EQIA is at Appendix (E).

17.4 The Wards Corner CPO EQIA concludes that:

'It is not considered that residual negative equality effects of the proposed development, as realised by the CPO, will amount to illegal discrimination. The positive benefits of the development for promoting the wellbeing of the area are considered to outweigh any residual negative equality effects.'

18 CONCLUSIONS

- 18.1 It is considered that the matters set out in paragraph 76 of Tier 1: Enabling Powers in the Guidance are satisfied. Further, appropriate steps have been taken to seek to acquire the land needed by agreement, and it is clear that compulsory acquisition is necessary to acquire the relevant land. In the circumstances, it is considered that a compelling case in the public interest is established for making the CPO.
- 18.2 [The Council will make the Order and associated documents available on its website (www.haringey.gov.uk).