

## Appendix 2

### High Road West - Responses to recommendations by Overview and Scrutiny Committee following their review of the High Road West scheme

	<b>Recommendation</b>	<b>Response (Agreed / Not agreed / Partially agreed)</b>
1.	Rent levels, including any service charges, for residents transferring from the Love Lane Estate to a property in the regeneration scheme or elsewhere should be the at the same level without a diminution in the security of their tenancy.	<p>The High Road West scheme will include 500 new Council homes. Love Lane tenants will be offered a new Council home in the scheme on a secure tenancy. For non-secure tenants this will provide greater security of tenure than they currently hold, while secure tenants will have an equivalent tenure.</p> <p>The Council normally sets council rents in accordance with the formula set out by government which are often called ‘formula rent’. This formula is used for all new tenancies, whether the home is newly built or part of the older stock.</p> <p>Cabinet agreed in July 2021 that for existing Love Lane residents moving to the new homes, the initial rental charges for new homes would be set at no more than 10% above the average Council rent for an equivalent property on the Love Lane Estate (to the bedroom size property that they are moving to) at the time of the move.</p> <p>This decision was made in consideration of the long-standing commitments to these residents that they would not be financially worse off as a consequence of redevelopment, balanced against the impact to the Council’s Housing Revenue Account (HRA). The increase of up to 10% is considering fair and affordable, reflecting that residents will move to a brand-new home and that this increase will be offset by savings, such as on energy bills due to the new homes’ increased energy efficiency. This rent commitment was included as part of the Landlord Offer, which was the subject of the recent resident ballot.</p> <p>Service charges will be calculated based on the services provided in the new blocks, which will be developed working with residents. As stated in the Landlord Offer, the Council is committed to ensuring service charges are kept as low and possible and affordable to residents.</p> <p>This recommendation is therefore <b>partially agreed</b> for the reasons set out above.</p>

<p>2.</p>	<p>The Committee was concerned to hear allegations around conduct by officers or other parties during the Love Lane ballot process but had not directly received any evidence of this. In the circumstances, the Committee recommends that a lessons learnt review is undertaken by the Council, with particular focus on the experience of residents, to inform any similar future ballots.</p>	<p>The Council has not received evidence relating to misconduct by officers during the Love Lane ballot. The Council has a corporate complaints procedure in place to respond to such concerns. As of January 2022, two complaints have been received in relation to the ballot, neither of which have been upheld nor subsequently appealed. See Appendix 3 for further discussion on this in response to the separate recommendation by the OSC regarding the Love Lane ballot.</p> <p>The Council will always seek to ensure that the resident experience is the primary consideration when planning engagement exercises. During the ballot, several residents contacted the Council to inform them that they had found this to be a difficult period, with a number of groups and their representatives visiting residents on multiple occasions with often contrasting views relating to the ballot. The Council takes resident feedback very seriously and fully recognises the need to learn from this experience to ensure that residents have all the required support in any similar future exercises. The Council is also developing the engagement strategy for the next phase of the scheme and will be seeking resident views and inputs to ensure that this maximises their participation in shaping the proposals.</p> <p>The recommendation for a lessons learnt review is therefore <b>agreed</b>. The Council has been reviewing the experiences and practices since the close of the ballot to continue to refine its engagement approach. A report setting out these findings will be produced and presented to Overview &amp; Scrutiny Committee in the first quarter of 2022.</p> <p>The lessons learnt thus far which will be taken into future ballots include the following:</p> <ul style="list-style-type: none"> <li>• Continue to improve our engagement processes to ensure that information is easily accessible and digestible to a wide range of demographics. This is mindful of the variety of languages spoken on the estate, and the complexity of the offer and the ballot process.</li> <li>• Explore more opportunities for the independent body for the ballot to engage with residents in advance, to increase confidence, trust and understanding of the independent process and administration.</li> <li>• Ensure that residents are aware that their vote is confidential, and that they are under no obligation to share their voting choice with other groups or individuals unless they want to do so.</li> <li>• Recognising that the needs of households can vary, ensure that residents are aware of the range of methods available to vote, including a mobile ballot box (managed by the independent body).</li> </ul>
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		<p>Provide a procedure for officers to collect the names of individuals who would like to submit their vote in person to the independent body.</p> <ul style="list-style-type: none"> <li>• Clearly communicate to residents what the respective roles are of the Council and the independent body, noting that the former will provide factual information on what the offer means to an individual household, and direct to wider support (e.g. access to an interpreter and independent advice) as and when required.</li> <li>• Linked to the above, ensure residents are aware from the outset that Council officers will always have an identification badge they can show, to differentiate them from other groups on the estate.</li> <li>• Ensure that all staff have adequate training and support prior to the ballot.</li> <li>• Ensure that the Council responds quickly to any misinformation circulated on the estate by providing accurate information, and responding to queries, so that residents can make their decision based on the facts available.</li> </ul>
3.	<p>As a principle, resident leaseholders should not be in a much worse financial position if they have to sell their leasehold interest and purchase a new unit in the regeneration scheme. To avoid this, the Council should offer a range of financial support measures to resident leaseholders in appropriate circumstances.</p>	<p>The Love Lane Leaseholder Offer has been developed to ensure that residents are not financially worse off as a result of the scheme. It includes an enhanced equity loan offer specifically for new homes in High Road West, which is an improvement on the baseline offer within the borough-wide Estate Renewal Rehousing &amp; Payments Policy (ERRPP). This enhanced equity loan option was developed directly in response to concern from leaseholders through consultation that they would not be able to acquire a new home in the scheme under the ERRPP terms.</p> <p>The enhanced equity loan offer lowers the minimum equity threshold that resident leaseholders are required to contribute from 60% to 25%. The minimum contribution by the leaseholder should be the same as the market value of their existing home on the Love Lane plus the Home Loss payment. If a leaseholder is unable to invest the whole value of their home (e.g. because of difficulties mortgaging) the maximum amount they can reasonably contribute towards the new home will be determined through a financial assessment.</p> <p>The minimum contribution of 25% of the value of the new property should mean that all resident leaseholders can afford a new home in the scheme. If the maximum amount a leaseholder can reasonably contribute is less than 25%, then their individual circumstances will be considered in light of an independent financial assessment. The Council will work with the leaseholder to find the most appropriate way of enabling them to stay in the area without adversely affecting their financial situation.</p>

		<p>The Council is committed to ongoing dialogue with leaseholders regarding their housing options and to find an outcome that best suits their individual preferences and circumstances.</p> <p>This recommendation is therefore <b>agreed</b>.</p>
4.	<p>The Council must ensure that adequate new infrastructure, including health and education services, is built into the redevelopment plans.</p>	<p>The planning process for the High Road West scheme will include consideration of the potential impact of the proposals on local services, including health and education, and will need to demonstrate that appropriate measures will be taken to mitigate any such impact. This includes ensuring that adequate infrastructure is provided either within the redevelopment plans or off-site.</p> <p>The Council has prioritised a localities approach through the scheme, where enhanced community spaces will be used to better link existing local neighbourhood services across north Tottenham. The socio-economic programme will also deliver employment and training opportunities for residents and promote good health and wellbeing, in a coordinated way alongside the physical interventions.</p> <p>This recommendation is therefore <b>agreed</b>.</p>
5.	<p>The Council should ensure that:</p> <p>a) Green spaces in the redeveloped areas should be of sufficient size and open to all. They should not be gated and for exclusive use of some tenures of residents.</p>	<p>a) <u>Green spaces</u></p> <p>The scheme will deliver a mix of green spaces. This will include open spaces, such as a large new park, which will be accessible to the whole community and provide opportunities for play, socialising and outdoor exercise. It is important to also provide spaces that permit a sense of ownership and privacy for the residents who live there. The scheme will include shared communal gardens, which would be accessible to residents of all tenants living the accompanying block – i.e. if Council and private homes are both situated within a block, all tenants would be able to access and enjoy these gardens together. There will also be private outdoor space (e.g. a garden, patio or terrace) for individual households. This recommendation is therefore <b>partially agreed</b>, on the basis that accessibility will depend on the nature of each space, as described above.</p> <p>b) <u>Communal spaces</u></p>

	<p>b) There should be communal spaces/halls for residents so that they are accessible to all.</p> <p>c) Cycle parks and parking rights should be the same for all tenures of residents.</p> <p>d) Construction of new properties in the regeneration scheme is carbon neutral.</p>	<p>The scheme will deliver new and enhanced community spaces which meet local needs. This includes a new Library and Learning Centre, which will be a publicly accessible community asset supporting the needs of local people of all ages and backgrounds, particularly in relation to employment and training opportunities, as well education and community events. The scheme will also deliver a refurbished Grange community hub to provide space for community organisations to run activities. This recommendation is therefore <b>agreed</b>.</p> <p>c) Recommendation 5c. has been split into two parts:</p> <p><u>Cycle parking</u></p> <p>Cycle parking will be provided for households of all tenures across the scheme, with a range of cycling parking spaces including long-stay, short-stay and on-street spaces provided. The scheme will also encourage active travel by creating cycle routes which better link to the wider cycle network. This part of the recommendation is therefore <b>agreed</b>.</p> <p><u>Car parking</u></p> <p>A permit allocation scheme will operate on-site for residents. For new residents (of all tenures), car parking spaces will be restricted to accessible spaces only. For existing residents living on Love Lane who own a vehicle, permits will be made available in addition to the accessible spaces within the Controlled Parking Zone (CPZ). This part of the recommendation is therefore <b>partially agreed</b>.</p> <p>d) <u>Construction and carbon</u></p> <p>The High Road West scheme will demonstrate climate change resilience and carbon reduction leadership by delivering a net zero carbon development ahead of the borough target of 2041. This recommendation is therefore <b>agreed</b>.</p>
6.	The new Council homes in the redevelopment must be suitable for the full range of needs of disabled	In line with the London Plan, 90% of the new housing will be 'accessible and adaptable dwellings', while the other 10% of new housing will need to reach the higher standard of being designed to be wheelchair accessible.

	<p>people. This should include accessible and adaptable housing as required by the London Plan and ensure that inclusive design principles are built into the construction of the homes that are to be acquired by the Council and in the wider redevelopment scheme.</p>	<p>The hybrid planning application for the scheme includes an Inclusive Design Statement, which sets out the design standards to be adopted across the site. This includes the following principles:-</p> <ul style="list-style-type: none"> <li>• Be designed taking into account the diverse population in the area;</li> <li>• Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion;</li> <li>• Be convenient and welcoming with no disabling barriers;</li> <li>• Providing independent access without additional undue effort, separation or special treatment; and</li> <li>• Be able to be entered, used and exited safely, easily and with dignity for all.</li> </ul> <p>For the housing, this includes suitably sized corridors, doors, lifts and stairs. These will be progressed as the detailed designs for each plot come forward.</p> <p>The Landlord Offer for Love Lane residents also includes a commitment that residents will be allocated a home that meets their needs, including any special adaptations as required. This could include grab rails or a wheelchair accessible kitchen. A dedicated rehousing officer will ensure that an Occupational Therapist completes a full assessment and that all the correct adaptations before the resident’s move to the new home.</p> <p>This recommendation is therefore <b>agreed</b>.</p>
<p>7.</p>	<p>Firm assurances should be given by the Council, as part of the ongoing discussions with the Grace Organisation, that its relocation should be prioritised within the Tottenham area close to where the majority of its current clients are located.</p>	<p>The Council has been working very closely with the Grace Organisation over a number of years to ensure that their new premises meet the commitments made by the Council in relocating their service from their current premises at Whitehall Street. The Irish Centre provides a facility that allows the Grace Organisation to maintain and enhance their current services and provide a high quality design, built to exacting standards, specifically for older people including those with dementia. The Irish Centre is around 500 metres away from their current location which ensures that it is ideally located to provide a local service to its current client group.</p> <p>This recommendation is therefore <b>agreed</b>.</p>

8.	<p>At the outset of significant regeneration schemes, higher priority and actions need to be given to ensure that those who will be impacted by a regeneration scheme are fully aware of the long-term plans and implications. A full and frank disclosure of Council's plans should be set out from the outset especially if regeneration plans include demolition of residential dwellings, business premises or buildings occupied by community and voluntary organisations. This should also include tenants that move to the area during the development of the scheme.</p>	<p>It is critically important to engage residents, businesses and other groups who are affected by the regeneration proposals from the outset. The Council has undertaken substantial engagement dating back to 2012, to develop the proposals from an early stage and ensure that various stakeholders are aware of the implications of the plans. This included a consultation in 2013 where the proposal to redevelop the area (including the demolitions of homes on Love Lane estate) was supported by 68% of Love Lane residents who responded.</p> <p>It also essential to continue ongoing communication and dialogue. In 2014 the Council agreed a set of Resident and Business Charters which set out its commitments. These have been progressed through further rounds of consultation on the masterplan and housing offer, and through specific events and one-to-one meetings with business owners. It is recognised that there is always more that can be done to enhance the quality of engagement and to create environments which support open conversations. This is particularly important due to the need to tackle challenging issues and work out the best solutions with and for the local community.</p> <p>The Council must also ensure that any groups or individuals, particularly tenants, who move to the area are informed of the proposals through this ongoing dialogue. In addition, regeneration schemes will often be shaped and developed over a long period and will include stages where progress can appear slow and there are less opportunities for engagement (for example, while funding discussions are underway). The Council must look at ways to maintain interest and participation in the process, and ensure it continues to keep stakeholders up to date.</p> <p>This recommendation is therefore <b>agreed</b> for the reasons set out above. The Council will continue to review its procedures, including across the various Council services to see where enhancements can be made.</p>
9.	<p>Future regeneration plans should be drawn up using co-production principles with active input from residents, businesses and community and voluntary organisations that live and operate within a proposed regeneration scheme. The Council should be able to demonstrate that</p>	<p>The Council is committed to increasing opportunities for local people to shape any changes in their area. It will continue to learn from co-production and similar innovative approaches to maximise the influence and participation of residents, businesses and community and voluntary organisations. It is recognised a variety of tools and approaches will be required in different scenarios, and the specific approach must be developed and defined depending on the project or task in hand.</p> <p>For the next stages of the High Road West scheme, the Council will be actively exploring opportunities for co-production, co-design and similar approaches. This will include working with residents and the community on</p>

	<p>regeneration is not simply being done to an area but is instead being designed in partnership with those who live and work in that area.</p>	<p>features such as the design of the new homes (e.g. layouts and colour palettes), community buildings and open spaces. This will also apply to the socio-economic programme, see the response to recommendation 13.</p> <p>The recommendation to use co-production principles for future regeneration plans is therefore <b>agreed</b>.</p>
<p><b>10.</b></p>	<p>Local businesses should not feel pressurised to relocate as a consequence of regeneration. Where there is evidence that relocation would make businesses potentially unviable due to loss of customer base and concerns about loss of freehold rights, the Council should use its best endeavours to design its regeneration plans to include a mixture of residential and light industrial units.</p>	<p>The Council should always fully consider the impact of regeneration schemes on businesses, recognising their importance as an integral part of the local community. The Council has a Business Charter in place which states a commitment to ensure that businesses are able to participate in the regeneration proposals and are fully supported through the process.</p> <p>It is acknowledged that in some cases, it may not be possible to deliver wider place-making benefits without some impacts on existing land and property owners. In these instances, the Council should use best endeavours to seek to relocate businesses within the new scheme, designing the plans to suit their needs and future aspirations. This should be with the aspiration to relocate them into comparable or, if possible, better quality and more suitable premises.</p> <p>Where it is not possible to relocate businesses into the scheme, then the Council should work closely with them to find suitable accommodation in the local area.</p> <p>This recommendation is therefore <b>partially agreed</b> for the reasons set out above.</p>
<p><b>11.</b></p>	<p>Compensation for businesses should reflect the extent of losses that any business is likely to suffer as a result of relocation which may include, without limitation, the following:</p> <ul style="list-style-type: none"> <li>- Price of purchasing similar premises.</li> <li>- Cost of moving business (including any rebuilding, redecoration or moving</li> </ul>	<p>The compensation package offered to businesses is provided in line with compulsory purchase legislations and the principles set out in the Government’s Guide to Compulsory Purchase and Compensation.</p> <p>This would typically include (but not limited to):</p> <ul style="list-style-type: none"> <li>• Reasonable professional fees</li> <li>• Removal expenses</li> <li>• Special adaptation to replacement premises</li> <li>• Temporary loss of profit during the period of the move</li> <li>• Diminution of goodwill following the move (reflected in reduced profits)</li> <li>• Depreciation in the value of the stock</li> </ul>



	<p>equipment or re-purchasing equipment if hard to move).</p> <ul style="list-style-type: none"> <li>- Loss of customer base until re-established in new premises.</li> </ul>	<p>As described in the High Road West Business Charter, every loss should be considered on its merits and should be recoverable if it is a direct and reasonable consequence of being disturbed.</p> <p>In response to the first bullet of the recommendation, under the Charter and relevant guidance, the Council would pay the business owner the open market value of their existing property. The funds received by the business owner for their property could then be put towards buying a replacement property (alongside any compensation) if they chose to do so.</p> <p>This recommendation is therefore <b>partially agreed</b> for the reasons set out above.</p>
12.	<p>The Council should give equal weight in the new Local Plan to protecting businesses as it does to achieving additional housing. Principles that underpin the GLA's Resident Ballot Requirement funding condition should apply to businesses. This could be achieved through proactive engagement with businesses taking into account their concerns and priorities.</p>	<p>The Council's new Local Plan will have a strong emphasis on enhancing and protecting the Borough's economy. The Plan will be structured around the Borough Plan priorities, including the Economy Priority, and will seek to support local businesses and to attract new investment and jobs into the Borough, whilst facilitating a positive environment to help support recovery and renewal from the combined impacts of Covid and Brexit. Planning policies must relate to the use and development of land and therefore are unable to protect specific businesses in planning decisions such as through a ballot requirement. However, the new Local Plan will be based on robust evidence of need and demand for business premises and will aim to protect sufficient land over the plan period for employment/business purposes.</p> <p>The Council recognises the importance of engagement with businesses in relation to the new Local Plan. As part of the First Steps consultation on the new Local Plan in late 2020/early 2021 the Council reached out to businesses in a variety of ways including through the Council's Business Bulletin. Within consultation responses there was strong support generally for protecting designated employment areas (those that are classified as employment areas on the Council's Policies Map) and for ensuring that small and medium sized enterprises have sufficient space to grow, that is affordable. The Council will seek to build on this initial business engagement as part of consultation on its Draft Local Plan in 2022 which will include more detail on site allocations such as at High Road West.</p> <p>This recommendation is therefore <b>partially agreed</b> for the reasons set out above.</p>
13.	<p>There should be transparency over how the £10m of funding in the programme is allocated and co-</p>	<p>A review of the socio-economic programme is currently being progressed with the aim for this to be complete in the first quarter of 2022. This will include an approach to delivery, ensuring that any projects that come</p>

	<p>production principles should be applied to allocate the funding based on the priorities of the local community.</p>	<p>forward reflect the most up to date Council policies and initiatives and respond to the changing needs of the community. It will also set out clear governance arrangements for the allocation of funding.</p> <p>The Council recognises that the programme presents a huge opportunity to develop and deliver projects with and for local people. The Council is looking at the best practice on co-production principles and similar innovative approaches in shaping its approach, learning from previous projects in the borough and further afield. Noting that co-production may not be possible for all aspects of the programme, The Council will seek to develop processes which are tailored to each element of the programme and ensure that funding is distributed fairly and in a way that maximises impact for local people.</p> <p>This recommendation is therefore <b>agreed</b>.</p>
<p><b>14.</b></p>	<p>Negotiations between the Council, Lendlease and THFC over the future of Phase B of the redevelopment site should take place at the earliest opportunity.</p>	<p>The Council has sought to engage with Tottenham Hotspur Football Club since the initiation of the scheme. The Council is committed to maintain good working relationships with THFC in future, while ensuring that the Council's interests are protected. This is recommendation is therefore <b>agreed</b>.</p>
<p><b>15.</b></p>	<p>The Council should ensure that the new Local Plan prioritises a mixed economy in the borough with sufficient employment space to support a diverse range of skills and employment opportunities for local residents.</p>	<p>The new Local Plan will aim to prioritise a mixed economy in the borough with sufficient employment space to support a diverse range of skills and employment opportunities for local residents. To provide evidence to underpin the new Local Plan policies on employment land an Employment Land Study has been commissioned. The Study is looking at both the current situation and the potential future situation and will make an assessment of how far the existing floorspace stock is meeting current and foreseeable occupier requirements and how far there is likely to be demand for more or different space, now or in the future. The study is yet to conclude but interim findings indicate a need for modern employment floorspace, with rising rents highlighting strong demand. Once the study concludes, it will inform the draft economy policies in the Council's Draft Local Plan.</p> <p>This recommendation is therefore <b>agreed</b>.</p>