

Housing Act (1985) Section 105 consultation report	Land near to Kings Road (Bruce Castle)
Date	30 September 2025

1. Introduction

- 1.1 Under the Housing Act 1985 (Section 105), Haringey Council (the council) has a legal obligation 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 services or amenities.
- 1.2 In June 2025, the council launched a Section 105 consultation based on proposals for a new housing development near Kings Road (N17) on the estate car park area behind 1-43 (odd) James Place and 11-49 (odd) Church Road) which would result in changes to the amenities of secure tenants in the area.
- 1.3 This report:
 - 1.3.1 Outlines the proposals put forward by the council and the impact on the amenities for secure tenants in the area.
 - 1.3.2 Provides an overview of the consultation process conducted by the council in accordance with its legal obligations under the Housing Act 1985 Section 105.
 - 1.3.3 Summarises the results and outcome of the consultation.

2 Proposals

- 2.1 In the proposals outlined to residents during the Section 105 consultation, the council stated its intention to make the following alterations to the amenities in the area:
 - 2.1.1 The proposed removal of 40 estate car parking spaces.
 - 2.1.2 The proposed relocation and re-provision of the two existing bin stores near 11-49 (odd) Church Road and 1-43 (odd) James Place currently next to the estate car park. (The 6 disused garages would also be removed.)
- 2.2 The locations of the proposed amenity changes are shown opposite, with an aerial photo showing the site's red line boundary. Within this boundary are the 40 parking spaces, bin store and bulky waste store (and the 6 disused garages that would also be removed: consultees were informed about their removal however, the garages are not classed as amenities). No existing homes will be redeveloped as part of these proposals. More details of these proposals are provided in the engagement brochure [here](#).
- 2.3 The council is proposing to make the changes to the amenities listed (in 2.1) in order to:



- 2.3.1 Build 9 council homes for local residents, including a wheelchair adapted home.
- 2.3.2 Reconfigure the arrangement and location of the bin and bulky waste stores for residents of 11-49 (odd) Church Road and 1-43 (odd) James Place.
- 2.3.3 Separately to the changes to the residents' amenities, the council explained that it would explore improvements for existing residents designed to tackle local anti-social behaviour (ASB), which may include new CCTV and lighting.
- 2.4 Given secure tenants will be losing an amenity (as noted in 2.1, above), a Housing Act 1985 Section 105 consultation was required.
- 2.5 The council consulted 38 households. Please note that the council consults leaseholders as part of Section 105 consultations as a matter of good practice.
- 2.6 The tenure of the households consulted is outlined below:

Scheme	Secure Tenants	Leaseholders
Kings Road (N17)	21	18

- 2.7 The consultation period lasted from Tuesday 24 June 2025 to Sunday 22 July 2025. Information provided included:
 - 2.7.1 A brochure (which can be viewed [here](#)) outlining the impact of the proposed developments on their affected amenities along with a site location plans, indicative design concepts and associated images. The pack also included a consultation questionnaire, including an equality and diversity questionnaire, a form to request the materials in different formats and languages, and a Freepost envelope for consultees to respond by post, and QR codes to enable consultees to respond online. The consultation pack was delivered to all secure tenants and resident landlords; non-resident leaseholders were sent a consultation pack to their registered address and a hand-delivered consultation pack to the address of their owned property within the consultation area.
 - 2.7.2 Contact details (including a phone number and email) of the engagement officer managing the consultation were included in the pack so consultees could request further information or the pack in a different format.
 - 2.7.3 The information about the consultation and the materials detailed above were also placed on both the Council's main website ([here](#)) and on the project's dedicated web hub, kingsroad.commonplace.is, where residents could complete the questionnaire online.
 - 2.7.4 To allow consultees to speak directly to Haringey's project team, two onsite meetings and a meeting in a hall close to the site were arranged. These engagement events were held for consultees on:
 - 2.7.4.1 Saturday 5 July, from 11am-2pm (pop-up event in the estate car park by Kings Road)
 - 2.7.4.2 Wednesday 9 July, from 11am-2pm (pop-up event in the estate car park by Kings Road)

2.7.4.3 Tuesday 15 July, from 6pm-8pm (in the Dinner Hall, Lancastrian Primary School, Kings Road)

2.7.5 A door knocking session of all those secure tenants who had not yet responded to the consultation was carried out on Friday 25 July.

3 Consultation responses

3.1 A breakdown of the consultation responses by tenure is outlined below:

Overall consultation audience	Total responses	Secure tenant responses	Leaseholder responses
39 (21 secure tenants, 18 leaseholders)	10 25.6%	6 28.6% (of total secure tenants)	4 22.2% (of total leaseholders)

3.2 To understand the use of the amenities listed at 2.1, consultees were asked three sets of questions relating to each amenity (estate car parking, bulky waste store, and the bin store).

3.2.1 Responses from consultees are outlined below. Please note that some respondents left parts of the question sections blank.

3.3 To understand their use of the estate car park, consultees were asked:

3.3.1 'Do you use the car park?' Yes/No

3.3.2 'If you answered 'yes', please tick how often you use the car park? ('everyday', 'weekly', 'occasionally', and 'friends, family, carer, when visiting')

Answered "yes" when asked if they used the car park?	Answered "everyday" when asked if they used the car park?	Answered "weekly" when asked if they used the car park?	Answered "occasionally" when asked if they used the car park?	Answered "by Friends, family, carer when visiting yes" when asked if they used the car park?
10 (6/4)	7 (4/3)	0 (0/0)	2 (1/1)	1 (1/0)

3.4 To understand their use of the bulky waste store at Church Road, consultees were asked:

3.4.1 'Do you use the bulky waste store close to 11-49 (odd) Church Road?' Yes/No

3.4.2 'If you answered 'yes', please tick how often you use the bulky waste store? (Please tick one of: 'everyday', 'weekly', 'occasionally', and 'never'.)'

Answered "yes" when asked if they used the bulky waste store close to 11-49 (odd) Church Road?	Answered "everyday" when asked if they used the bulky waste store close to 11-49 (odd) Church Road?	Answered "weekly" when asked if they used the bulky waste store close to 11-49 (odd) Church Road?	Answered "occasionally" when asked if they used the bulky waste store close to 11-49 (odd) Church Road?
8 (5/3)	4 (3/1)	2 (1/1)	2 (1/1)

3.5 To understand their use of the bin store at St James Place, consultees were asked:

3.5.1 "Do you use the bin store close to 1-43 (odd) James Place?" Yes/No

3.5.2 "If you answered yes, please tick how often you use the bin store? (Please tick one of: 'everyday', 'weekly', 'occasionally', and 'never'.)"

Answered "yes" when asked if they used the bin store close to 1-43 (odd) James Place?	Answered "everyday" when asked if they used the bin store close to 1-43 (odd) James Place?	Answered "weekly" when asked if they used the bin store close to 1-43 (odd) James Place?	Answered "occasionally" when asked if they used the bin store close to 1-43 (odd) James Place?
9 (5/4)	7 (4/3)	1 (0/1)	1 (1/0)

3.6 To judge the impact of the proposed changes on secure tenants and leaseholders, consultees were asked:

3.6.1 'What impact would the proposal to build new council homes on the car park have on you?'

3.6.2 'What impact would the proposal to re-provide and relocate the bulky waste store have on you?'

3.6.3 'Where would you like to see the bin stores relocated, and why?'

- 3.7 The answers to these questions are summarised in the below table, including the council's response. Please note, this is a summary of the relevant comments submitted in relation to the terms of the Section 105 consultation.

Consultation Feedback: Removal of the 40 car park spaces
All of the respondents to the consultation stated that they used the car parking spaces in some manner, with a high proportion using the car parking spaces on a regular basis (seven out of ten of the respondents). All respondents to the consultation, both secure tenants and leaseholders, expressed some form of concern about the loss of the 40 estate car parking spaces at Kings Road. <u>Increased parking stress</u> Eight respondents (of which four were secure tenants) expressed strong concerns about the lack of parking in the surrounding area, which is already administered by a controlled parking zone and which, they explained, is already very heavily parked. These respondents explicitly stated that the loss of the existing car parking spaces would result in further parking stress across the local area. One secure tenant added that they needed onsite parking for their carer. One leaseholder queried whether the removal of the parking bays could restrict access to the site by emergency services, while another leaseholder suggested that that increased traffic (from vehicles seeking a car parking space) would impact on their employment (i.e. delays on reaching their place of employment). Four leaseholders raised concerns that offsite parking would lead to more crime affecting their vehicles (as they would be further away from their homes) and another leaseholder suggested the loss of a parking amenity would impact negatively on the sale or rental value of their home.
Response and consideration: Removal of the 40 car park spaces
The council does appreciate the importance of estate car parking to residents, especially those with carer responsibilities or needs. In terms of the council's response to the feedback from respondents: • Maintaining adequate parking capacity has been a key consideration in the design process for this project. As explained during the Section 105 consultation, current residents of 1-43 (odd) James Place and 11-49 (odd) Church Road will be offered the opportunity to purchase permits for the controlled parking zones covering the roads surrounding their estate. This should allow vehicles to be parked in this area. • In addition, and in line with the borough's zero car parking policy for new developments, the proposed new homes close to Kings Road will be car-free. This means new residents will not be eligible for parking permits, helping to protect existing parking provision for current residents. The proposals also include one dedicated disabled bay, which will be allocated for the sole use of the adapted home that will form part of the new housing proposed at this site. These homes are being designed to support vulnerable residents, including those with

disabilities, and the council is committed to ensuring that accessible parking remains available for those who need it most.

- As part of the planning application process, a formal parking survey will be conducted to assess current usage and inform future arrangements. This survey will help ensure that any changes to the estate's parking layout are based on accurate data and reflect the needs of residents. Following feedback from respondents, the council will continue to engage with the community throughout the planning process to ensure that parking and accessibility are considered in full.
- The planning application process will also include an assessment of the potential impact on local infrastructure and, as a key consideration, the access requirements of local emergency services to the new and existing homes.
- On parking for carers, the council appreciates this point: should the proposals proceed, the council will conduct an information campaign in the local area to signpost residents to the council's processes for applying for disabled (blue badge) permits and/or designated parking bays.
- In terms of concerns around anti-social behaviour (ASB), the council does understand the importance of ensuring the safety of residents and their property. Following feedback from consultees, the council will consider further enhanced CCTV coverage for the area around the new council homes and more lighting across the development area. As part of the design process, the council will, as on all the council's new homes sites, ensure safety for new and existing residents is paramount and a key consideration.
- It should be noted that while open space maybe lost because of these proposals, the council does need to balance concerns with the acute need for new affordable, council homes in the borough. Like many other local authorities, the council does face an acute need for affordable homes. Under the council's [Neighbourhood Scheme Moves Policy](#), local residents in need will be given priority when the new proposed homes delivered on the Tiverton Road estate are let.

Consultation Feedback: Removal and relocation of local bin stores

Removal of bulky waste store near 11-49 Church Road

Four secure tenants and three leaseholders expressed concern about the proposed removal and relocation of the bulky waste store, primarily due to a concern the bulky waste might be relocated further from their homes.

Relocation of the bin store (near 1-43 James Place)

Five secure tenants were concerned that the existing bin store would be relocated further from their homes, with one secure tenant conversely concerned that if it was moved closer to existing homes, there would be increased issues of smells, hygiene, and vermin.

However, two secure tenants saw the proposals more positively, as an opportunity to improve access for existing residents to the bin stores; one secure tenant responded that they might be better located closer to existing homes; another secure tenant saw the chance to improve this amenity with better lighting and more security.

Several leaseholders were concerned as to whether they would be required to contribute to the re-provision or relocation of the bin stores.

Response and consideration: Removal and relocation of local bin stores

The council understands that adequate waste provision is extremely important to all residents.

In response to the feedback from consultees, if the proposed development proceeds:

- The council welcomes the recognition by some secure tenants that, because the proposed development would require the relocation of the existing bin stores, there is an opportunity to improve the estate's current bin arrangements. The council will work with existing residents to reconfigure the estate's bin arrangements and will aim to make them more accessible, with improved lighting and security, and to better tackle fly-tipping. The council does need to emphasise that no final decisions have been made about the placement of the bin stores and we do recognise the importance of these facilities being close to existing homes, with provisions to prevent any fly tipping or other issues. The comments during this consultation will directly feed into the council's considerations on this matter.
- In terms of a financial contribution to any changes to the bin storage, the council intends to fully cover the cost of re-providing the bin stores: no contribution will be required from leaseholders or tenants.

- 3.8 Additional comments were received regarding the potential impact of the development which are outside the remit of this consultation. Where applicable, these issues will be raised with the relevant internal council teams. These included:
- 3.8.1 Concerns about poor maintenance and repair of existing buildings on the estate.
- 3.8.2 Concerns over poor upkeep of the open space, play area, and landscaping, with residents expressing concern at whether the new communal areas will be properly maintained by the council.
- 3.8.3 Complaints that CCTV cameras and lighting monitoring the estate car park are obscured by tree foliage from Network Rail land: this has been explicitly raised with the relevant internal council team.
- 3.9 Alongside the Section 105 consultation, the council also asked residents, including non-secure tenants and non-leaseholders, for their views about all aspects of the proposals, including initial design ideas for the project and early-stage landscaping or other

community improvement plans. The results from this community engagement process are being considered separately and will be fed back to the project team overseeing these proposals.

- 3.10 Across all engagement events, a total of 15 attendees joined across the three sessions. Comments made during these events have been captured in 3.10 - 3.11.

4 **Equality and diversity assessment**

- 4.1 The Kings Road estate car park site, located to the rear of St James Place, Tottenham (N17 8NP), is a council-owned parcel of land situated within a densely populated residential area. The site currently functions as a surface-level 40 space estate permit car park serving residents of the adjacent blocks on St James Place and Church Road. In addition to parking provision, the site includes six disused garages and a refuse and bulky waste storage area.

- 4.2 The new development will deliver nine much-needed affordable homes on council-owned land. The inclusion of larger four-bedroom homes responds directly to a significant gap in the Council's existing housing stock, particularly for larger households currently placed in temporary or high-cost accommodation due to the lack of suitable provision. This scheme not only meets urgent housing needs but also supports long-term financial sustainability by reducing reliance on more expensive housing solutions. Additionally, the development contributes to the Council's strategic target of delivering 3,000 new council homes by 2031.

- 4.3 The proposed development has been designed to address existing issues of anti-social behaviour through improved site layout, natural surveillance, and secure access arrangements. Upgraded refuse storage facilities will support the Council's efforts to reduce fly-tipping in the area, contributing to a cleaner and safer environment. Collectively, these improvements will enhance the overall quality of the public realm and promote a more positive living environment for existing and future residents.

4.4 **Legal Context**

- 4.4.1 Under the Equality Act 2010, the Council has a statutory Public Sector Equality Duty (PSED) to have due regard to the need to:

- 4.4.1.1 Eliminate discrimination, harassment, and victimisation.

- 4.4.1.2 Advance equality of opportunity between persons who share a protected characteristic and those who do not; and

- 4.4.1.3 Foster good relations between persons who share a protected characteristic and those who do not.

- 4.4.2 This duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Marriage and civil partnership are relevant to the first limb of the duty. Haringey Council also considers socio-economic status as a local priority characteristic.

4.5 **Local Demographic Context**

- 4.5.1 The Kings Road estate car park site is located in the Bruce Castle ward, adjacent to Tottenham Central and Northumberland Park. The estate car park is used by residents of the adjacent blocks on St James Place and Church Road. This area is among the most diverse and socio-economically challenged in Haringey:
- 4.5.1.1 Ethnicity and Diversity: Over 60% of residents in Bruce Castle identify as Black, Asian or Minority Ethnic (BAME), significantly higher than the London average.
- 4.5.1.2 Deprivation: Bruce Castle falls within the 20% most deprived wards in England, with high levels of income deprivation, child poverty, and unemployment.
- 4.5.1.3 Housing Need: Haringey has over 3,000 households in temporary accommodation, many of whom are families with children living in overcrowded or unsuitable conditions.
- 4.5.1.4 Disability and Health: The area has a higher-than-average proportion of residents reporting long-term health conditions or disabilities.
- 4.5.1.5 Age and Family Structure: The local population is younger than the borough average, with a high proportion of children and young adults under 35.

4.6 **Impact on Parking Provision**

- 4.6.1 The proposed development will result in the removal of 40 existing estate car parking spaces (and 6 disused garages). While this constitutes a reduction in local parking capacity, the site is situated within a Controlled Parking Zone (CPZ) and benefits from strong public transport accessibility, with a PTAL (Public Transport Accessibility Level) rating of 4/5.
- 4.6.2 The area is well-served by multiple bus routes and lies within walking distance of both White Hart Lane and Bruce Grove stations. Existing residents will remain eligible to apply for parking permits in adjacent streets, which include designated disabled parking bays.

4.7 **Impact on Residents with Protected Characteristics**

- 4.7.1 The removal of 40 estate car parking spaces and six disused garages has the potential to disproportionately affect residents with disabilities, particularly those who rely on private vehicles for mobility and access to essential services. However, this impact is mitigated through several measures:
 - 4.7.1.1 The site benefits from strong public transport connectivity, with a PTAL rating of 4/5, supporting independent travel for residents without access to a car.
 - 4.7.1.2 Residents will remain eligible to apply for parking permits within neighbouring Controlled Parking Zones (CPZs), which include designated disabled parking bays.
- 4.7.2 The scheme is expected to deliver positive outcomes for several groups with protected characteristics:
 - 4.7.2.1 Families with children: The provision of larger, family-sized homes will help address overcrowding and support improved health, educational, and social outcomes.
 - 4.7.2.2 Low-income households: The delivery of secure, affordable council housing will provide stability and financial resilience for residents experiencing economic hardship.

- 4.7.2.3 Homeless households: By increasing the supply of permanent accommodation, the scheme will contribute to reducing reliance on temporary housing and improving long-term wellbeing.

4.8 Environmental and Amenity Considerations

- 4.8.1 Although the scheme involves the loss of hardstanding estate car park space, it will deliver:
 - 4.8.1.1 Improved amenity space for residents with a focus on reducing ASB, fly tipping and use of the refuse stores by non-residents
 - 4.8.1.2 A more attractive and safer environment for all users, including children and older residents.

4.9 Conclusion

- 4.9.1 While the removal of 40 estate car parking spaces may result in some localised impact particularly for residents who rely on private vehicle access; the overall equalities impact of the Kings Road estate car park N17 scheme is assessed as positive.
- 4.9.2 The delivery of nine new family-sized council homes will directly benefit households in housing need, including those with protected characteristics. The scheme incorporates appropriate mitigations to address potential adverse effects, such as accessible design features, targeted parking provision, and enhanced public transport connectivity. As such, the proposal aligns with the Council's commitment to inclusive development and its statutory duties under the Equality Act 2010.

5 Assessment

- 5.1 The responses received during the Section 105 consultation have been considered by the Council. Responses to comments from residents have been answered in 3.10.
- 5.2 It is acknowledged that the removal of 40 estate car park spaces and the relocation and re-provision of the bin store arrangements (and the removal of the 6 disused garages) could have an impact on residents, though the delivery of new council homes could be an overall benefit to the wider community. As a result, the council will:
 - 5.2.1 Offer the current residents of 1-43 (odd) James Place and 11-49 (odd) Church Road the opportunity to purchase permits for the controlled parking zones covering the roads surrounding their estate.
 - 5.2.2 Designate the proposed new homes close to Kings Road as car-free, in line with the borough's zero car parking policy for new developments. This means new residents will not be eligible for estate parking permits, helping to protect existing parking provision for current residents. The proposals also include one dedicated disabled bay, which will be allocated for the sole use of the adapted home that will form part of the new housing proposed at this site. These homes are being designed to support vulnerable residents, including those with disabilities, and the council is committed to ensuring that accessible parking remains available for those who need it most.
 - 5.2.3 Conduct a formal parking survey to assess current usage and inform future arrangements. This survey will help ensure that any changes to the estate's parking layout are based on

accurate data and reflect the needs of residents. Following feedback from respondents, the council will continue to engage with the community throughout the planning process to ensure that parking, accessibility, and estate functionality are considered in full.

- 5.2.4 Include, as part of the planning process, an assessment of the potential impact on local infrastructure and, as a key consideration, the access requirements of local emergency services to the new and existing homes.
- 5.2.5 Signpost residents needing parking for carers to how they can apply for disabled (blue badge) permits and/or designated parking bays.
- 5.2.6 Consider further enhanced CCTV coverage for the area around the new council homes and more lighting across the development area. As part of the design process, the council will, as on all the council's new homes sites, ensure safety for new and existing residents is paramount and a key consideration.
- 5.2.7 Work with existing residents to reconfigure the estate's bin arrangements and will aim to make them more accessible, with improved lighting and security, and to better tackle fly-tipping.
- 5.2.8 Fully cover the cost of re-providing the bin stores; and the council will write to all secure tenants and leaseholders to advise them that no contribution will be required.

6 **Recommendations**

- 6.1 Based on responses received from the consultation, the Council recommends that:
 - 6.1.1 The mitigations outlined in 3.9 and 5.2 in response to the feedback from consultees regarding the loss of amenity spaces under these proposals are reasonable and fair.
 - 6.1.2 Proposals should proceed as outlined in 2.1.