Scrutiny Session, Haringey Development Vehicle, London Statement by Professor Loretta Lees 3rd April 2017

Relevant expertise and professional role

Since September 2013 I have been Professor of Human Geography and Director of Research, Department of Geography, University of Leicester. I was previously Professor of Human Geography and Chair of the Cities Research Group at King's College London. I have a PhD in Geography (awarded 1995) from the University of Edinburgh. I am an international expert on urban regeneration, gentrification, urban sustainability, urban policy, urban communities and urban public space. I have published five books on processes of gentrification and two books specifically on London². All of these books are underpinned by academic research on topics of direct relevance to this statement. In addition, I have particular expertise on council estate regeneration/renewal/gentrification in London, which informed the production of a booklet - The London Tenants Federation, Lees, L, Just Space and SNAG (2014) *An Anti-Gentrification Toolkit for Council Tenants in London*³ and an academic paper on the Aylesbury Estate - Lees, L. (2014a) The urban injustices of New Labour's 'new urban renewal': the case of the Aylesbury Estate in London⁴. These two pieces of research were submitted as evidence to the London Assembly's Housing Committee Investigation into Social Housing Estate Regeneration⁵.

I am an expert urbanist and a Londoner. I live in Archway, Islington. I was invited as an expert guest to the first meeting of the Urban Regeneration Committee at the GLA to talk about urban regeneration in London⁶ and I have delivered numerous key note speeches in both London and around the globe on gentrification, mixed communities policy, and so on. My current academic focus is on the future of council housing in London in terms of the future social sustainability of London as a whole (Lees, 2014b)⁷ for which I have been awarded a £615,341 ESRC⁸ research grant.

 $http://www.london.gov.uk/moderngov/documents/s26533/Regeneration\%\,20 the\%\,20 Situation\%\,20 in\%\,20 London.\,pdf$

¹ Lees,L. et al. (2016) *Planetary Gentrification*, Polity Press: Cambridge; Lees,L. et al. (2015) (eds) *Global Gentrifications: uneven development and displacement*, Policy Press: Bristol; Bridge,G., Butler,T., and Lees,L. (eds) (2011) *Mixed Communities: gentrification by stealth?*, Policy Press: Bristol; Lees,L. et al. (2010) *The Gentrification Reader*, Routledge: London; and Lees,L. et al. (2008) *Gentrification*, Routledge: New York. ² Imrie,R. and Lees,L. (2014) (eds) *Sustainable London? The future of a global city*, Policy Press: Bristol; Imrie,R., Lees,L. and Raco,M. (2009) (eds) *Regenerating London: governance, sustainability and community in a global city*, Routledge: London.

³ http://www.londontenants.org/publications/other/Staying%20Put.pdf

⁴ Lees, L. (2014a) The urban injustices of New Labour's 'new urban renewal': the case of the Aylesbury Estate in London, *Antipode*, 46:4:921-947.

⁵ <u>http://www.london.gov.uk/sites/default/files/Volume%203-</u> <u>%20Social%20Housing%20Estate%20Regeneration%20Consultation%20Responses.pdf</u> (Volume 2 Sub-006, Sub-006a, Sub006b)

⁷ Lees, L. (2014b) The death of sustainable communities in London, in Imrie, R. and Lees, L. (eds) *Sustainable London? The future of a global city*, Policy Press: Bristol, pp.149-172.

⁸ PI: Lees, L., CoIs: Hubbard, P. and Tate, N. ESRC 2017-2020. Gentrification, Displacement, and the Impacts of Council Estate Renewal in C21st London (full fec £769,176).

In this statement I draw in particular on my academic research on (and thus evidence from) the Heygate Estate being redeveloped as Elephant Park by Lend Lease and on my international expertise on mixed communities policy and state-facilitated gentrification and displacement. This statement questions the decision taken by Haringey to redevelop a number of its council estates as newly built, mixed communities through the Haringey Development Vehicle. My statement relates to the broader context of the reduction of council housing provision across London in general, and the increasing rent and house prices that make it difficult for lower and even middle income groups to remain in the city.

My key argument is that mixed communities initiatives like the HDV lead to gentrification and displacement and that this is not in the public interest of either Haringey residents nor of London more generally.

The 'new' urban renewal of Haringey's council estates through the HDV is underpinned by the idea of mixing tenures in newly built mixed communities:

6.3 To deliver economic growth and provide new housing on the scale required, the Council has to use its own landholdings. Estate renewal on the Council's large and medium sized estates also provides a major opportunity to increase the number of homes, to improve the mix of tenures and sizes and to address the condition of the housing stock.

6.14 Achieve estate renewal by intensification of land use and establishment of a range of mixed tenures, together with tenure change across the Borough where appropriate. To secure wider social and economic benefits in areas affected, including community facilities, skills and training, health improvement or crime reduction for the benefit of existing residents.

Yet mixed communities initiatives have been found, after extensive academic and policy research, both in the UK and the US, to produce gentrification and the displacement of public housing tenants. Current plans to redevelop council estates in Haringey will not only displace tenants from their homes but it also goes against the idea of the social (and economic) sustainability of cities (as is embedded in the London Plan and national urban policy).

The idea of redeveloping public housing estates as mixed communities

The concept of mixed communities re-emerged as a major urban policy and planning goal in the 1990s in reaction to large concentrations of supposedly socially homogenous populations of poor people living in the inner cities of Western Europe and North America. UK policy makers drew on US policy makers ideas about poverty deconcentration. In 1992 Congress passed the US Department of Housing and Urban Development's HOPE VI program (Housing Opportunities for People Everywhere), the result of the National Commission on Severely Distressed Public Housing. HUD began to demolish large public housing projects at the centre of US cities and to disperse project residents using Section 8 rental vouchers. In the late 1990s in the development of New Labour's urban renaissance agenda the council estate played a symbolic and ideological role as a signifier of a spatially concentrated, dysfunctional underclass. Blair's Social Exclusion Unit was set up to deal with such social problems: 'Over the last two decades the gap between these worst estates and the rest of the country has grown....It shames us as a nation, it wastes lives and we all have to pay the costs of

dependency and social division' (Blair in SEU⁹). Council estates were one of their main concerns: '....over the past 20 years, poverty has become more concentrated in individual neighbourhoods and estates than before, and the social exclusion of these neighbourhoods has become more marked' (SEU, 2000¹⁰). Their solution was a 'New Deal for Communities' based on the creation of mixed communities - 'the Mixed Communities Initiative'.

Schoon (2001)¹¹ outlines the distinct rationales in policy debates for social mixing. First, the 'defending the neighbourhood' argument claims that since middle class people are stronger advocates for public resources, socially mixed neighbourhoods will fare better than those without middle class households. Second, the 'money-go-round' argument claims that tenurially and socio-economically mixed neighbourhoods are able to support a stronger local economy than areas of concentrated poverty. Finally, the 'networks and contacts' argument draws on Robert Putnam's (1995¹²) influential account of bridging and bonding social capital to promote social mixing as the way to generate social cohesion and economic opportunity. Central to New Labour's urban renaissance agenda was the idea that in socially mixing council estate communities the benefits of urban revitalization/gentrification would 'trickle down' to the lower and working classes economically, socially, and even culturally.

A mixed communities initiative - the Heygate Estate – now Lend Lease's Elephant Park
The now demolished Heygate Estate in Elephant and Castle, Southwark, was home to over
3,000 people. In 2011 when demolition of the Heygate Estate began it was ranked 3rd out of
all 32 London boroughs for income inequality. The demolition of the Heygate Estate was part
of a wider plan to regenerate the area around the Elephant and Castle road junction and
shopping centre. Efforts to regenerate the Heygate began in the 1990s with New Labour's
Single Regeneration Budget, the masterplan for the demolition of the estate was adopted by
Southwark Council in 2004 and in 2007 Lend Lease (an Australian property development
company with a global portfolio and a controversial track record; see
http://www.newstatesman.com/2013/02/southwark-accidentally-leaks-confidentialinformation) were chosen as the developers¹³. The decanting of tenants began and three years
after the 'New Homes for Heygate Tenants' plans were approved, only one planning
application had been submitted out of a promised 16 new Housing Association-run blocks.
Dave Ware, Regeneration Team Project Director, said at a Walworth Community Council
meeting 'I can only apologise and say that this was more difficult than we appreciated'.

As part of the decantment of the Heygate Estate the council set out to 'persuade' the tenants into accepting new Housing Association properties in the Heygate area (with no security of tenure, more expensive rents and with less controls over housing associations) or council properties outside their local district of Walworth. Council tenants were asked to find homes

⁹ SEU (1998) *Bringing Britain Together: a national strategy for neighbourhood renewal*, Cm4045, The Stationary Office: London.

¹⁰ SEU (2001) *A new commitment to neighborhood renewal: national strategy action plan*, Social Exclusion Unit: London, P7.

¹¹ Schoon, N. (2001) *The chosen city*, Spon Press: London.

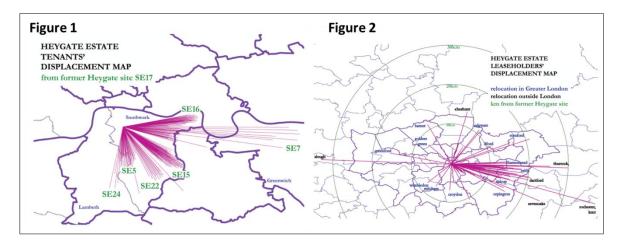
¹² Putnam, R. (1995) Bowling alone: America's declining social capital, *Journal of Democracy*, **6** 65-78.

¹³ See http://www.corporatewatch.org/?lid=4635 on the http://www.kpmg.com/uk/en/services/advisory/management-consulting/pages/business-resilience.aspx processes issued by Lend Lease.

themselves through the Council's Homesearch waiting list and bidding scheme and were given only 6 months to do so:

'it took six times because you know, if you don't accept any of the bidding you go back, you know, you go to the bottom again. But you know, I think I got mine after the third bidding' (ex Heygate council tenant who was displaced, interview 2013).

Then the council began to issue eviction notices over the heads of those who failed to find their own council place or refused the council's offer of alternative housing (see Figure 1 council tenant displacement).



Some leaseholders were offered part-rent, part-buy flats in the nearby 'socially mixed' Strata Tower in 'intermediate affordable housing' in floors 2-10 run by the Family Mosaic Housing Association. The applicant needed to purchase at least 25% of the flat, they also had to earn between £18,000 to £60,000. The Strata Tower was the only retained-equity scheme offered but the service charges alone were unaffordable to most former Heygate residents. One leaseholder from the Heygate who was offered a flat in the Strata Tower, was given £150,000 for her 3-bed flat on the Heygate Estate, but flats in the Strata Tower ranged from a studio flat at £240,000 to 3 bed flats at £775,000. The 2-bed penthouse went on the market for £1.6 million. Moreover she had worked three jobs, seven days a week to pay off her mortgage and saw her 'right to buy' flat as an investment for her children. To buy in the Strata (or indeed elsewhere in London) she would need to get another mortgage – not easy on her low income and with insecure jobs and new mortgage restrictions – her life security and investment was destroyed (see Figure 2 leaseholder displacement).

Only a small percentage of Heygate council tenants signed up for the 'right to return' (which means moving twice) – some of those because they wanted to remain council tenants (even if it meant living elsewhere) – but the evidence from New Orleans shows¹⁴ that once people have moved once and got kids into school etc. they are loath to move again. A film was made were two tenants who forced to move from the Heygate southwarknotes.wordpress.com/heygate-estate/ - Janet and Larry Move Out by King Chain Productions), it shows well the stress and upset that displacement causes. In 2009 the BBC's programme also featured displacement from the Heygate (http://www.bbc.co.uk/insideout/content/articles/2009/03/05/london_heygate_s15_w8_video

¹⁴ Government reports confirm that half of the working poor, elderly and disabled who lived in New Orleans before Katrina have not returned. Read Arena (2012) on the transformation of New Orleans public housing from public to private.

<u>feature.shtml</u>). When the tenant mentioned earlier searching the Homesearch waiting list, who signed the 'right to return' was asked: 'And would you like to go back once it's finished, once it's completed?', she answered: 'That one I'm not sure. Because I moved away from London and I'm in Kent...I had...friends when I was there but I lost contact...I still have their numbers but it's the distance and everything' (interview, 2013).

The demolition began in 2011 and is now complete and the bulk of the new build 'mixed community' has been constructed. Southwark Council sold the Heygate for £50 million (and they have not yet even finished paying off the building of the original estate) and then spent a further £44 million moving 1,000 residents out. Southwark Council's expected capital receipts from the Heygate land are almost equal to the costs incurred in emptying and demolishing the buildings! None of the homes in the new development will include ex-Heygate council tenants or leaseholders. Despite there being an explicit rationale for the inclusion of Heygate residents in the Southwark Plan (see http://www.southwark.gov.uk/info/856/planning_policy/1241/the_southwark_plan/1), the new flats are all for private sale.

In 2014 Lend Lease marketed the newly named Elephant Park overseas in East Asia, to wealthy off-plan buyers looking for second homes, investments, buy-to-lets, homes for their student sons and daughters etc. While the Heygate was home to 1,194 social-rented flats at the time of its demolition, the new £1.2bn Elephant Park will provide just 82 such homes among its 2,500 units (although note none of these will be council). Five hundred flats will be "affordable" – ie. rented out at up to 80% of London's superheated market rate, on the affordable housing con read: London Tenants Federation (2012) *The Affordable Housing Con*, Available at: http://www.londontenants.org/publications/reports/LTF%20-%20afordable%20housing%20con%20final%20xxx.pdf. The bulk are for private sale, at £569,000 for a studio, or £801,000 for a two-bed flat.

On Lend Lease and share of profits read:

http://35percent.org/2016-05-11-no-profit-share-the-true-value-of-the-heygate-regeneration/

Lend Lease will profit not Haringey:

http://35percent.org/2016-12-05-heygate-profits-north-of-a-hundred-million/

On Lend Lease and viability assessment, showing how Lend Lease operates read: http://35percent.org/2015-06-25-heygate-viability-assessment-finally-revealed/

The evidence base on Mixed Communities policy

Social mix policies rely on a common set of beliefs about the benefits of mixed communities, with little evidence to support them, and a growing evidence base that contradicts the precepts embedded in social mix policies that should make policy-makers sit up and take note. As Cheshire (2009)¹⁵ argues mixed communities policy is essentially a faith-based policy since there is scant real evidence that making communities more mixed makes the life

¹⁵ Cheshire,P. (2009) Policies for mixed communities: a faith based displacement activity?, *International Regional Science Review*, 32:3:343-375.

chances of the poor any better. Indeed, academic research has found that the rhetoric of 'social mix' more often hides a gentrification strategy and in that a hidden social cleansing agenda (Cameron, 2003; Uitermark et al., 2007)¹⁶. Indeed, conceptually, policy claims about the causal links between more socially mixed communities, increased social mixing, the development of social capital and cohesion, and decreased social exclusion and deprivation, have been criticised as something of an 'analytical sack of potatoes' (Fine, 2001; Kearns, 2003)¹⁷. Drawing on ESRC funded research (ESRC RES-451-26-0340), Bridge, Butler and Lees (2011)¹⁸ collated academic and policy evidence on mixed communities policy from around the globe and stated clearly: '...the overwhelming conclusion of this review is that is that social mix policies are largely ineffective in enhancing the welfare of the poorest residents, and in some cases detrimental to the welfare of the urban poor' (p.319).

International experts on mixed communities policy are clear that it is a failure with respect to the social mobility of the poor and that the end result is more often than not some form of gentrification. As Gotham (2001)¹⁹ has shown with respect to the HOPE VI program in the US: 'the redevelopment of public housing [in the US] is a form of "exclusive" development that is designed to exclude the very poor from the revitalized spaces and render them safe for resettlement by the wealthy and affluent'. Mixed communities policy in London has not aided the revitalization of depressed neighbourhoods, rather it has reduced affordable housing and contributed to spiralling rents and prices (Arbaci and Rae, 2013; Imrie and Lees, 2014)²⁰.

As the *What Works Centre for Local Economic Growth* (2015)²¹ report makes clear, we know very little about the ways in which the 'new' urban renewal programmes enacted on London council estates have shaped the lives of the original dwellers that they were designed to improve. This is because many of the original residents fail to make it back to the redeveloped neighbourhoods. The Heygate Estate is now symbolic of this.

The academic evidence on displacement

Gentrification induced displacement can be direct or indirect. Marcuse $(1985:207)^{22}$ is clear that displacement is related not only to the actual removal of low-income households by eviction or compulsory purchase, but also the fact that indigenous residents might not feel at home anymore in the changed neighbourhood because of the general decline of working class

¹⁶ Cameron, S. (2003) Gentrification, housing redifferentiation and urban regeneration: 'Going for Growth' in Newcastle upon Tyne, *Urban Studies*, 40 2367-2382. Uitermark, J., J. Duyvendak and R. Kleinhans (2007) 'Gentrification as a governmental strategy: social control and social cohesion in Hoogyliet, Rotterdam', *Environment and Planning A*, 3:1:125-141.

¹⁷ Fine, B. (2001) *Social capital versus social theory*, Routledge: London, p.190. Kearns, A. (2003) Social capital, regeneration and urban policy, in Imrie, R. and Raco, M. (eds) *Urban renaissance? New Labour, community and urban policy*, Bristol: Policy Press, pp.37-60.

¹⁸ Bridge, G., Butler, T., and Lees, L. (eds) (2011) *Mixed Communities: gentrification by stealth?*, Policy Press:

¹⁹ Gotham, K.F. (2001) 'Redevelopment for whom and for what purpose?' in K. Fox Gotham (ed.) *Research in Urban Sociology Volume 6: Critical Perspectives on Urban Redevelopment* (Oxford: Elsevier) p.437.

²⁰ Arbaci,S. and Rae,I. (2013) Mixed tenure neighbourhoods in London: policy myth or effective device to alleviate deprivation?, *International Journal of Urban and Regional Research*, 37:2:451-479. Imrie,R. and Lees,L. (2014) (eds) *Sustainable London? The future of a global city*, Policy Press: Bristol

²¹ http://whatworksgrowth.org/policy-area/estate-renewal/#.VUCVBtjnnIU

²² Marcuse,P. (1985) Gentrification, abandonment and displacement: connections, causes and policy responses, *Journal of Urban and Contemporary Law*, 28:195-240.

culture and identity. As he argues, 'When a family sees the neighbourhood around it changing dramatically, when their friends are leaving the neighbourhood, when the stores they patronise are liquidating and new stores for other clientele are taking their places, and when changes in public facilities, in transportation patterns, and in support services, all clearly are making the area less and less livable, then the pressure of displacement is severe'. Marcuse (1986)²³ discusses exclusionary displacement:

'Exclusionary displacement from gentrification occurs when any household is not permitted to move into a dwelling, by a change in conditions which affects that dwelling or its immediate surroundings, which

- (a) is beyond the household's reasonable ability to control or prevent;
- (b) occurs despite the household's being able to meet all previously imposed conditions of occupancy;
- (c) differs significantly and in a spatially concentrated fashion from changes in the housing market as a whole; and
- (d) makes occupancy by that household impossible, hazardous or unaffordable'.

A number of academic and policy studies have underlined the difficulties that relocated public housing residents have in rebuilding social networks (eg. Clampet-Lunquist, 2004a,b; Gibson, 2007)²⁴, and this should come as no surprise given the many studies of displaced communities and social networks as a result of post-war urban renewal programmes. As even the GLA (2015:14)²⁵ now recognize, 'a process of "gentrification" may, over time, accompany regeneration, the new homes being occupied by households more affluent than previous residents'.

What we are seeing is what Hyra (2008) has called 'new' urban renewal

'New' urban renewal: is a term that Hyra (2008)²⁶ has used to refer to the C21st urban renewal of public housing projects in the US through the Federal Government's HOPE VI program. He argues that today's urban renewal of public housing projects in the US is similar to, but distinct from post-war urban renewal. Like post-war urban renewal it is state-led, but it differs in that today there are global factors contributing to this urban transformation and as opposed to post-war urban renewal, where a good proportion of low income groups benefitted from the renewal, today real estate developers and those seeking to invest in property prosper whilst low income groups are displaced from the communities they know and call home. The case of the Heygate Estate shows this well and it is not in the public interest of Haringey's council tenants, nor of Londoners as a whole, if we want a properly diverse and socially mixed city as The London Plan claims it does.

²³ Marcuse,P. (1986) Abandonment, gentrification and displacement, in Smith,N. and Williams, P. (1986) (eds) *Gentrification of the City*, Allen and Unwin, p.153-177.

²⁴ Clampet-Lundquist, S. (2004a) Moving over or moving up? Short-term gains and losses for relocated HOPE VI

Families, *Cityscape*, 7, 1, 57 - 80. Clampet-Lundquist, S. (2004b) HOPE VI relocation Moving to new neighborhoods and building new ties, *Housing Policy Debate*, 15, 2, 415 - 447. Gibson, K. (2007) The relocation of the Columbia Villa community: views from residents, *Journal of Planning Education and Research*, 27:5-19.

https://roeregeneration.wordpress.com/2015/03/06/london-assembly-paper-knock-it-down-or-do-it-up/
 See Hyra,D. (2008) *The New Urban Renewal: the economic transformation of Harlem and Bronzeville*,
 University of Chicago Press: Chicago. Hyra was a community development expert in the US Department of the Treasury, he also worked for HUD, and is now a professor at the American University, Washington , DC.

The value of council tenancies for low income groups²⁷

This HDV will impose long-term and potentially unforeseen risks on Haringey Council, rendering formerly secure council estates and tenancies inherently insecure.

I recommend you read: White,H. and Lees,L. (2015) Report for draft Housing and Planning Bill, *Why we Can't Afford to Lose it: local authority housing in London protects the poor from homelessness*. Submitted as Evidence. http://ch1889.org/wp-content/uploads/2015/11/Canweaffordtolosethem-FC2.pdf

Key points relevant taken from the document:

Local authority housing plays an essential role in protecting those who are vulnerable as a result of old age, mental illness or physical disability, as well as those on low incomes, from homelessness.

§ Local authority tenants with a secure tenancy are better protected than housing association or private tenants.

§ The Pre-action Protocol for Possession Claims by Social Landlords protects both local authority and housing association tenants. Housing associations, unlike local authorities, however, can seek possession of a property using a Ground 8, Section 8 Notice.

In sum, council housing best protects marginal populations.

Good practice with respect to estate regeneration

The council has said:

2.4 In agreeing this approach, we make clear commitments: to do our utmost to re-house council tenants in the area where they currently live and on similar terms, if that's what they want; that a Resident's charter is adopted, which sets out the expectations of Northumberland Park residents and is written by the residents themselves; that the development vehicle will be bound by our planning policy requiring 40% affordable housing; and that consultation with residents is guaranteed, with a commitment that sites can only be transferred to the vehicle once that has taken place.

To establish and provide recommendations on the feasibility of the proposed joint venture model of council tenants being re-housed on rent matching that of an equivalent council property and on the same terms, either on the estate or elsewhere in the borough, according to their choice;

- To establish and provide evidence and recommendations on whether the HDV can deliver a tenancy and evictions policy which protects vulnerable tenants in the same way as council tenancies do

See above on the displacement that comes with these schemes and the affordable housing con.

On a residents charter, the right to stay put etc., I recommend you read Lees,L. (2017) *Report for GLA's draft good practice guide to estate regeneration*. Submitted to GLA. Attached.

Key points relevant taken from the document:

²⁷ White,H. and Lees,L. (2015) Report for draft Housing and Planning Bill, *Why we Can't Afford to Lose it:* local authority housing in London protects the poor from homelessness. Submitted as Evidence.

TENURE & SECURITY: The guidance needs to say more about security of tenure – council tenants can lose their secure tenancies through being forced to move into new homes that are no longer classified as 'council' homes. Council estate residents facing displacement need more than 'high priority' in local allocations policy. Guarantees over moving to the same or similar rent levels need to be much clearer in this respect. Many residents on regenerated estates end up paying much higher rents, service charges and council tax despite pre-regeneration promises that rents would not go up. As the evidence presented at the Aylesbury CPO public inquiry showed (http://35percent.org/2016-09-18-aylesbury-compulsory-purchase-order-rejected/) leaseholders are also badly affected by estate regeneration, they need a 'London market value promise' which means that they are given enough money (with no increase in mortgage or new service charges) to be able to afford to buy the same kind of property in the same borough or on the regenerated estate. The guidance needs to be clearer about leaseholder rights.

THE RIGHT TO STAY PUT: There is much emphasis on the 'right to return', not the right to stay put – to be able to remain in the same community, to be able to return to the (redlined) footprint of the original estate. This needs to be central to the guidance, to avoid the wholesale destruction of socially and ethnically mixed urban communities in London. Equally, if residents are given the right to return to a suitable home, who ultimately determines what a suitable home might be, and that the offer to residents is 'reasonable'?

AFFORDABLE HOUSING: There are many get-out caveats in the guidance: for it to carry more weight these need to be removed. For example, it is implied that the loss of affordable homes could be justified if it allows the construction of 'better quality homes at existing or higher densities with at least the equivalent amount of floorspace', taking into account 'community benefits' and the amount of affordable housing elsewhere in the borough (mirroring London Plan policy 3.4). This provides existing social housing residents little reassurance as there is no definition of what a better home might be, or what community benefits follow from the provision of better housing. The baseline principle – that there should be no net loss of affordable housing is also flawed, as most 'affordable housing' is simply not affordable for the majority of London's council estate residents. We argue that the guidance should ensure that estate redevelopment ensures a net *increase* in council housing (the only truly affordable housing for low income Londoners) given London's housing crisis.

Risks for the Council and Haringev residents

Haringey's vehicle stands out. It is a JV, which is unusual. In addition, the scale of its ambitions – using public land with a gross development value of £2bn – mark it out as an extreme case. Public land is being transferred to a private company. This is a huge cost to the council, in terms of land and revenue.

The model is unproven, and the scale at which Haringey is undertaking it is unprecedented.

The council is becoming a speculative house builder, in an uncertain post-Brexit market. This involves taking on very high levels of risk.

Given Lend Lease's track record outlined above, the council must question whether sharing its land and profits with Lend Lease is prudent. Lend Lease's commercial interest will no doubt conflict with the council's motivations at times.

At this stage Haringey's DV is exceptionally light on detail, and involves very few guarantees to citizens for a scheme with so many uncertain elements. This is privatisation of both council land and council housing.

Haringey residents need guarantees about aspects of the DV.

Requests

Scale the scheme down if it cannot be stopped altogether.

Pursue a wholly-owned model.

As with other models of regeneration the number of social homes get reduced incrementally as the scheme nears completion. In this case, Haringey, at pre-contract phase, are not even making any promises about net numbers of social homes. This is concerning. We need numbers that are agreed in advance and stuck to.

A guarantee is also needed to ensure that the homes have identical qualities to council tenancies, and that they remain this way in perpetuity. The same for leaseholder properties.

A ballot and a right of return need to be enshrined.