

**Haringey Council Core Strategy Examination  
Hearing Session 8, 22<sup>nd</sup> February 2012**

**2c Housing**

- i. Is the evidence in support of SP2 sufficiently robust and does it justify the affordable housing threshold?**
  - a. In line with the requirements set out in PPS3 paragraph 11, SP2 is supported by a robust evidence base. It is considered that the evidence supports and justifies all elements of SP2 including the affordable housing threshold.
  - b. PPS3 and the London Plan require Local Authorities to set their own plan wide housing targets taking account of the strategic targets, the priority for affordable family housing, other housing needs, the need to promote mixed and balanced communities, land availability and viability, and availability of resources.
  - c. SP2 Housing is supported by a sub-regional Strategic Housing Market Assessment (SHMA), a Strategic Land Availability Assessment (SHLAA), a local Housing Trajectory (HT) and a local Affordable Housing Viability Assessment (AHVA).
  - d. The outputs and recommendations of the SHMA, SHLAA and HT are summarised in the Council's Factual Statement 1 – Housing (FS-1) (paragraphs 2.2 – 2.23), and that of the AHVA are set out in the Council's response to the Inspector's Matter 2, Issue 2.9 (MI-C2). These papers were submitted to the Inspector ahead of Hearing 1 as part of the Examination in Public June/July 2011.
  - e. The findings of the AHVA justifies the change in affordable housing threshold from 5 units to 10 units, and shows that the 50% affordable housing target on sites with the capacity to deliver 10 units or more is the most viable option for Haringey. Through the assessment of very small sites in Haringey, i.e. below 10 units, the study found that the cost and time involved in carrying out financial appraisals, and negotiating with developers and Registered Providers may outweigh the modest increase in affordable housing from these smaller sites.
  - f. In the case where the Council envisages significant numbers of small windfall sites coming forward, the study recommends introducing a sliding scale policy for sites with the capacity to deliver less than 10 units, in order to discourage that threshold being used to avoid compliance with the policy. To reflect this recommendation, SP2 was amended to include a sliding scale element (Please see CSSD-03a). The Council will prepare interim guidance on the implementation of this

policy, ahead of the adoption of the emerging Development Management DPD.

- g. Based on the outputs from the supporting evidence base, the Council consider SP2 to be robust and justified.

- ii. **Is the policy sufficiently flexible (with due regard to development viability and the advice of PPS3)?**
- a. Haringey's approach to housing provision takes account of the social, environmental and economic impacts, and is adaptable and flexible, identifying broad locations for housing development and is supported by evidence which identifies specific sites.
- b. In line with advice set out in PPS3, SP2 identifies the quantity and type of housing need through up to date evidence and clearly sets out where and when this need will be met. The approach to housing is considered effective for meeting the current identified needs of the borough, and flexible enough to deal with future change in housing need, housing markets and housing capacity.
- c. The Council considers that the Affordable Housing Viability Assessment (AHVA) (Oct 2010) provides sound evidence for SP2, and the policy is flexible and takes account of viability issues on a site by site basis. In response to comments to the revised consultation Sept-Nov 2011 and to provide clarity that the Council accepts that viability is a key consideration in affordable housing provision, the Inspector is asked to consider the following amendment to the fifth bullet point in SP2, to read as follows:
- "Subject to viability, sites capable of delivering ten or more units, will be required to meet a borough wide affordable housing target of 50%, based on habitable rooms"*
- d. Following submission of the Core Strategy in March 2011, the Council proposed amendments to SP2 in response to changes made in June 2011 to PPS3. Please see the Council's response to the Inspector's matters and issues, MI-C2, paragraphs 11.1 and 11.2. In addition, the Council is developing an interim position statement on affordable rent to provide clarity and guidance for developers and Registered Providers on the Council's approach to affordability and rent levels.
- e. It is considered that SP2 is flexible in line with guidance set out in PPS12 and PPS3. The five year housing supply and the 15 year housing trajectory, which supports the policy, demonstrates Haringey's deliverable and developable housing sites to meet the short, medium and long term housing needs of the borough. This reflects the guidance in paragraph 4.15 of PPS12 which states that Local Authorities should ensure a long term view to housing supply and provide flexibility in their policy. This is also in line with paragraph 52 in PPS3 which states that Local Planning Authorities should ensure that a 'flexible, responsive supply of land' is available in order to meet planning and housing objectives.

- f. To ensure flexibility and responsiveness of the policy, SP2 will be updated and amended in line with changes in housing need and capacity through the Annual Monitoring process. The AMR will identify needs for updating the evidence base and carrying out relevant additional studies. It is recognised that the housing need figure produced by the SHMA is a five year figure, it is expected this will be reviewed and updated within the next five years. Additionally, the London wide SHLAA is currently being updated which will produce the most up to date housing capacity figures for London and individual boroughs.
- g. SP2 was also supported by the former Government Office London (GOL) at Regulation 27 consultation May/June 2010. GOL considered Haringey's Core Strategy to be flexible to meet its growth targets. The GLA have raised not raised any concerns, from a general conformity point of view.
- h. The Council considers SP2 is flexible, in line with PPS3 and is sufficiently supported by a robust evidence base.