

5pm on Friday 4<sup>th</sup> March 2016 [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Ref:  (for official use only)	<b>Local Plan</b> Publication Stage Response Form	
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Name of the DPD to which this representation relates:

Local Plan/Local Development Framework

**Please return to London Borough of Haringey by 5pm on Friday 4<sup>th</sup> March 2016**

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

## Part A

	1. Personal Details <sup>1</sup>	2. Agent's Details
Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Maria"/>	<input type="text"/>
Last Name	<input type="text" value="Jennings"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████████"/>	<input type="text"/>
Address Line 3	<input type="text" value="████████"/>	<input type="text"/>
Post Code	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email address	<input type="text" value="████████████████████"/>	<input type="text"/>

<sup>1</sup> If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

## Part B – Please use a separate sheet for each response

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy: SP 2  Policies Map

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Haringey Council's policy intention is to reduce the level of affordable housing on large sites to 60% instead of the current policy of 70% affordable rented. Having reviewed Haringey Council's Evidence Base documents on housing I cannot find any evidence to support this policy change, which would be to the detriment of those in greatest housing need.

The key parts for Affordable Housing of the National Planning Policy Framework (NPPF) are:

1. Para 47(1) "local planning authorities should use their evidence base to ensure that the Local Plan meets the **full**, objectively assessed needs for **market and affordable** housing in the housing market area, .."
2. Para 50(1) " plan for a mix of housing based on ...market trends and the **needs of different groups** in the community.."
3. The NPPF states that affordable housing is "provided to eligible households whose needs are **not** met by the market".
4. Affordable Rent is housing let to "households who **are eligible** for social rented housing."
5. Affordable Rent is subject to rent controls that require a rent of **no more than** 80% of local market rent.

It is most important to note that the NPPF is clear that there must be a difference between market housing and affordable rented housing.

Haringey Council's original Housing Planning Policies were adopted before the current NPPF. The proposed Housing Planning Policies do not conform to the NPPF, despite the requirement to do so. Haringey Council has failed to objectively assess needs for Affordable Housing, and it has failed to assess the needs of families and disabled people in particular, as is required. As a consequence of having failed to assess the need for Affordable Housing Haringey Council has failed to ensure that its Local Plan meets the **full**, objectively assessed needs for **market and affordable** housing.

Haringey Council's evidence base documents demonstrate that land is available and that affordable housing is economically viable on **all** sites generating positive residual values (all housing development costs having been taken into account) of up to £14m.

Haringey Council's evidence base documents that consider the need for affordable housing are:

- LBH Strategic Housing Market Assessment May 2014 produced by commercial property valuers GVA Grimley Ltd.
- Haringey Council Housing Needs Assessment June 2007 produced by Fordham Research Ltd.

Unfortunately, neither document is robust and credible for different reasons, which are set out below.

Haringey Council Housing Needs Assessment June 2007 produced by Fordham Research Ltd.

- This report though dated June 2007 on the front cover is detailed as 2005 in the left hand page header and it was clearly written in 2005. It seems that whoever decided to change the front cover failed to change the date in the left hand header inside the document which states 2005.
- This report does provide a detailed and **full**, objectively assessed needs for **market and affordable** housing and it considers the **needs of different groups** but only for 2005 and it does so using different guidance that was current at the time.
- Figure 10.1 (page 85) states that Haringey is a borough with a very high need for new Affordable Housing, considerably greater than for inner London as a whole and almost twice as high for outer London as a whole. This was clearly justifying the target for 70% of affordable housing to be for rent. Given Haringey's context of low levels of provision of Affordable Housing together with very high housing costs and very low incomes a very high need for new Affordable Housing was to be fully expected. Given the real increases in housing costs and decline in real median incomes it is only to be expected that the need for Affordable Housing in Haringey has increased in the last 10 years.
- As the information in this report is well over 10 years old it cannot be robust or credible, and it certainly forms no basis for justifying a reduction in the provision of new rented Affordable Housing from 70% to 60%.

LBH Strategic Housing Market Assessment May 2014 produced by commercial property valuers GVA Grimley Ltd.

- This report relies very heavily on census data from 2011 and it fails to consider the current guidance on Housing and Economic Development Needs Assessments in a number of respects. The Planning Practice guidance on methodology for assessing housing need requires that overcrowding and homelessness be considered as a key market signals, (the guidance signposts to government held homelessness statistics prepared by local authorities in quarterly P1E returns) but GVA simply assume homelessness as part of the housing waiting list.
- Some tables are referenced GVA but there is no indication of the source of the data. At least one table is referenced Haringey Housing Needs Survey 2013 but no trace of any such survey can be found.
- Unfortunately this report does not provide a **full**, objectively assessed needs for **market and affordable** housing and it fails to consider the **needs of different groups** despite the availability of clear and concise guidance. The NPPF which has been in place since 2012, well before the report was written, is clear that a Local Plan shall meet the **full**, objectively assessed needs for **market and affordable** housing.
- The current Planning Practice guidance has also been in place well before the report was published but does not seem to have been followed.
- The housing market area has been incorrectly drawn, with Waltham Forest excluded from the housing market despite being the third most important place for net outward migration (figure 5).
- The report in several places seems to fail to follow logic. Figure 41 fails to present CACI median incomes but confirms that CACI lower quartiles incomes are below £20,000 for over three quarters of households in the borough. Table 38 sets out buying a home on the open market is affordable to 60% of households with an income of between £20,000 and £25,000 paying a yearly mortgage of £21,864. This is clearly not coherent and even those households with an income of £25,000 would be left with a disposable income after housing costs of only £60 per week.
- The report appears to have several confusions about Welfare Reform and benefit caps. There is reference to a Housing Benefit cap of £500 per week for families on low incomes for families to rent privately. This is incorrect and there is a Housing Benefit to the level of the 30<sup>th</sup> percentile of local market rents, and an Overall Benefits Cap for families taking into account all their benefits (including Housing Benefit) of £500 which is being reduced shortly as part of the government changes to welfare policy.
- The report conflates the need for affordable housing with affordable rent. Table 40 which purports to examine affordability is indicative of the confusion as affordable rent is shown to be unaffordable to 75% of households whilst buying a home on the open market is unaffordable to only 65% of households. Table 48 appears to do the same suggesting that buying a home on the open market is far more affordable than affordable rent.

- Table 62 assumes that there are 1,597 vacant social/affordable dwellings that can be brought back into use and that there are no dwellings to be demolished. Given the very small affordable housing stock in Haringey such a high vacant property rate figure must be questioned. Similarly Haringey Council has been publicising its plans to demolish large amounts of its council housing for some time so the figure, which is given as zero cannot be correct.

The evidence base used by Haringey provides an indication of a high level of need for affordable housing. This is consistent with Office for National Statistics data and the very accessible data about Haringey on the London Poverty Profile website which shows that lower quartiles rents in Haringey are £1.257 for a two bedroom property and that such rents would demand 74% of lower quartile incomes.

<http://www.londonpovertyprofile.org.uk/indicators/topics/housing-and-homelessness/rents-and-affordability/>

The GVA report does demonstrate without doubt that Affordable Rent at 80% of market (mean and median) rents are not affordable to “households whose needs are **not** met by the market”. The Housing Policies within the Haringey Local Plan do not meet the **full**, objectively assessed needs for **market and affordable** housing, especially so in respect of the need for affordable housing. Simply calling a product affordable does not mean that it is affordable and the NPPF is clear that a Local Plan must address the needs of those whose housing needs cannot be met by the market. In those areas where there is little difference between social rents and market rents, e.g. North East, North West and Yorkshire & Humber, affordable rents of 80% market rent make sense, however that is clearly is not the case in areas where market rents are high, as they are inevitably unaffordable.

My evidence invites the Inspector to reject the proposed changes to the Housing Policies in the Haringey Local Plan because they reduce the provision of Affordable Housing and those policies do not conform to the current NPPF. My evidence also invites the Inspector to reject the proposed changes to the Housing Policies as they are not in conformity with the London Plan policies for family housing or housing for people with disabilities.

The Inspector may wish to note that Haringey Council’s consultation process makes it far more difficult to make a comment than very many other LPAs.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

I respectfully suggest that the adopted Haringey Local Plan Housing Policies for Affordable Housing should stand and the proposed policy to reduce the provision of Affordable Housing should be rejected. With clear evidence of a high need for Affordable Housing, including over 3,000 families in homeless

temporary accommodation, and over 1,000 families shipped to temporary accommodation in places as far afield as Liverpool and Birmingham, this proposal for a reduction is not credible. I invite the Inspector to ask Haringey Council to produce Housing Policies for households whose needs are **not** met by the market and to produce a Local Plan which meets the **full**, objectively assessed needs for **market and affordable** housing.

(Continue on a separate sheet/ expand box if necessary)

**Please note** your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

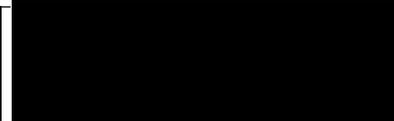
Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

The Inspector may wish to test and question the evidence I have submitted.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.*

9. Signature



Date:

3.3.2016