

## COUNCIL STATEMENT

### Chapter 3 – Housing

**6. DM11 – Is Part C necessary? What is this based upon? What is meant by overconcentration – how would this be determined? Would part A.a be sufficient to cover this point in any event?**

The Council considers that Part C is necessary especially in respect of development proposals within Growth Areas where the criterion of Part A.a of the policy is subject to significant change. This is based upon the experience with pre-application discussions undertaken, in particular, within Tottenham Hale.

**7. DM11 Part E – is private ownership and investment a planning matter? This should be removed from policy and necessary, put in the supporting text.**

DM11.E helps give effect to London Plan policy 3.8B(a1) and paragraph 3.54B which provide that a positive approach should be taken to enable the Private Renting Sector (PRS) to contribute to the achievement of housing targets. Whilst it is acknowledged that PRS schemes can be delivered by various stakeholders, the Council is particularly keen to engage with institutional investors to encourage more professional and less fragmented management, higher quality standards and potentially, longer rental periods and more affordable rents. The Council considers that PRS should support long-term investment in the Borough and the policy reflects local objectives in this regard.

**8. DM13 Part G – what is the status of part G in light of the successful challenge to the provision of affordable homes on small sites? What mechanism does part H refer to – this is not clear?**

DM13.G should be deleted from the policy to bring it in line with the Alterations to Strategic Policies (see Local Plan Submission Library, Document 22 – Schedule of Minor Modifications, modification reference MM19).

DM13.H is referring to the exceptional circumstances set out in 13.F. It is acknowledged that the policy could be amended to include a specific cross-reference for clarity.

**9. DM13 Part B a – How will you assess whether a site has been artificially subdivided? What criteria will you use to determine whether it is developer choice or artificial subdivision?**

This will be assessed based on:

- Whether the sites/land parcels are in the same ownership;
- The occupied status of sites/land parcels at the grant of planning permission for the first application and at commencement of the development;
- Land agent/ infrastructure provider intelligence as to development interest; and

- The time lapsed between completion of the first development before planning permission is sought for the next

It is the choice of the developer to phase the development scheme but the requirement/trigger of the policy in both the London Plan and Local Plan is in respect of a development site with capacity to accommodate 10 or more dwellings.

**10. DM13 Part B. b and c – what is meant by an amended planning application? How will b and c be implemented if there is change in ownership/applicant? Is this lawful having regard to the planning unit? How would this comply with national policy which seeks to remove the requirement for affordable housing for small scale schemes?**

An amended application is one where the developer has sought to change the granted housing schedule of a scheme at some point during the construction period. This is common on very large phased development schemes where market demand/market factors for a particular size or type of housing changes over a long build out period necessitating a change to the housing size/type in the latter phases to ensure the development remains viable and is delivered. The amendment is usually dealt with by way of a Section 73 planning application but may require the original affordable housing provision to be revisited where the amended scheme results in an increase in the total number of homes or residential floorspace to be delivered, or significantly improves the viability of the latter phases of the development, enabling an uplift in affordable housing. Such provision would still apply with a change in ownership/developer but would only apply to development sites with capacity to provide 10 or more units in accordance with Part A.

With regard to criterion c of Part B, there are numerous examples of sites that benefit from prior approval, where the applicant/developer then also applies for planning permission to change the remainder of the floorspace on a site to a residential use or to add an extension (e.g. additional floors) to provide for additional residential provision. In such circumstance, while the permitted development is exempt from providing affordable housing, the additional residential units should not. In such circumstances the negotiation of the affordable housing due on the additional residential development would be based on the total residential units to be provided on the site.

The above detail on the implementation of the policy is to be included in a revision to Council's Affordable Housing and Planning Obligations SPD.

**11. DM15 Part B.a – why is it necessary to demonstrate need for specialist housing? What is the justification for this? Does this comply with the London Plan? Is there an over/under provision in the Borough? Part B.b – are these standards covered under other legislation?**

The needs analysis set out in Haringey's Older People's Housing Strategy 2011 – 2021, shows that the number of older people (65+) will increase over the plan period from 21,000 in 2010 to 24,600 by 2025, with the greatest increase in the 85+ age band (an increase of 1,200).

With regard to existing and required provision for specialist housing, the Strategy finds that the Borough is over provided for in sheltered housing but there is a need for extra care

**housing.** The accompanying survey of older people's demand suggests that there is a growing number of older people who wish to remain in their own homes rather than move into specialist housing accommodation. The strategy therefore goes on to suggest that the identified need will be met by supporting older persons to continue to live independently in their own homes through personalised budgets (enabling them to buy services directly), and through the provision of support services, such as Metropolitan Care and Repair that helps people on low incomes to get disable adaptations and repairs to their homes, and advice and information provided by Age Concern about funding and service providers.

**The Council's further strategy towards meeting specialist housing needs is to adapt its** existing Council housing stock, and to maintain a register of adapted properties in Council and housing association stock.

Meanwhile, the London Plan provides an indicative annual target for the borough for the provision of specialist housing for older people of 100 units, comprising 80 for market sale and 20 intermediate sale. This indicative target is part of the overall strategic housing requirement set by the London Plan for the borough. However, against the background of changes to the way services and support for older people are commissioned, there remains uncertainty as to the level of under or over provision of supply of the various forms of specialist housing needed in the borough over the next 10 years. For this reason, and the significant need for conventional housing, it is appropriate that applicant for specialist housing provide evidence of a demonstrable need for the particular for the specialist housing proposed.

It is considered that the criterion of Part B.b of the Policy informs the internal and external considerations of proposals for the different forms of specialist housing. The Council is not aware that these are necessarily covered by other legislation.

## **12. DM15 – Part C and Part D.e – why is it necessary to demonstrate need? Does this comply with the London Plan? What is the justification for this?**

**It is recognised that London's education institutions** can make a significant contribution to the economy and labour market. The policy therefore aims to support this sector by enabling the delivery of purpose built student accommodation to meet local and strategic need. However, in addressing demand for this type of specialist accommodation it is **imperative that the Borough's capacity to meet conventional housing needs is not** compromised, as these take primacy in the overall context of housing delivery, consistent **with the London Plan and Haringey's Strategic Policies.**

DM15.C and 15.D(e) require that proposals provide evidence of a demonstrable need for specialist student accommodation. This will ensure that development addresses specific requirements, normally linked to specified education providers, and also help guard against speculative development on sites where conventional housing might otherwise be delivered. The requirements are considered particularly necessary given the uncertainty over the future growth in London's student population and the supply/demand relationship regarding its specialist housing needs, as provided by the supporting text to London Plan policy 3.8.

**13. DM16 Part A.g – Is this policy flexible enough? Should it reflect the wording in DM11 which indicates that a development of all smaller units may be acceptable in some circumstances?**

Policy DM11 applies to new residential development, rather than conversions. In accordance with the overarching spatial strategy, which seeks to maintain a supply of existing larger family units through maintenance of the existing stock of family housing, Part A.g of Policy DM16 seeks to ensure residential conversion also retain, where practicable, larger units (i.e. 3 bed). The Council considers the policy to be sufficiently flexible to consider the individual circumstance of the dwelling being converted.