

Housing Delivery Test Action Plan

August 2019



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1. Introduction

- 1.1 The delivery of new homes is a key national issue. In recent years the Government has implemented numerous measures in an attempt to help stimulate and support home building including ongoing reform of the planning system.
- 1.2 In 2018 the Government published a revised version of the National Planning Policy Framework (NPPF). As part of the changes a new ‘Housing Delivery Test’ (HDT) was introduced to be implemented on a phased basis. Once fully implemented the HDT will have the following consequences:
- The publication of an action plan if housing delivery falls below 95% of a **local planning authority’s adopted housing requirement over the previous three years;**
 - **A 20% buffer on a local planning authority’s five-year land supply** if housing delivery falls below 85% of the adopted housing requirement (this in effect would require the Council to find additional sites for an additional 20% of the housing requirement); and
 - **The ‘presumption in favour of sustainable development’ in the NPPF would apply automatically** if housing delivery falls below 75% of the adopted housing requirement, once transitional arrangements have ended in November 2020. (It should also be noted that the presumption will apply if housing delivery falls below 25% of the housing requirement in November 2018 and 45% of the housing requirement in November 2019).
- 1.3 The Government published its 2018 HDT Measurement in February 2019. This indicated that the borough had delivered only 48% of its housing requirement in the preceding three years. Therefore an Action Plan is required to be published.
- 1.4 This Action Plan has been prepared to show how the Council is responding to the challenge of ensuring that more homes are built in Haringey and faster. In line with National Planning Practice Guidance¹ it identifies the reasons for under-delivery, explores ways to reduce the risk of further under-delivery and sets out measures the Council intends to take to improve levels of delivery. This document is intended to be a practical document focussed on effective measures aimed at improving delivery within the borough underpinned by local evidence and research of key issues.

¹ <https://www.gov.uk/guidance/housing-supply-and-delivery>

2. Housing delivery in Haringey

- 2.1 The Council's housing targets are set by the London Plan and are derived from an assessment of the capacity within the borough to deliver additional housing. The London Plan 2016 sets the Council an annual target of 1502 net additional dwellings.
- 2.2 The Ministry of Housing, Communities and Local Government (MHCLG) published its first HDT Measurement in February 2019 measuring delivery in the years 2015/16, 2016/17 and 2017/18. Table 1 below sets out the **Government's published measurement together with the Council's own** assessment of delivery measurement as reported in the **Council's** Authority Monitoring Report (AMR) 2017/18².

Table 1: Housing Delivery Test measurement

	Number of homes required	Number of homes delivered - MHCLG figures	Number of homes delivered - Council's own figures
2015/16	1502	239	660
2016/17	1502	719	774
2017/18	1502	1191	1210
Total	4506	2149	2644
Housing Delivery Test measurement		48%	59%

- 2.3 There is a significant discrepancy between the **Government's published figure** for 2015/16 **and the Council's** own assessment of delivery. **The Government's 2015/16** figure reflects the figure initially report by the Council for that year. However, following a comprehensive review covering ten years of monitoring data, the Council identified a revised figure of 660 net completions for 2015/16. This was reported in subsequent AMRs. Upon publication of the Housing Delivery Test results, the Council contacted MHCLG to alert it to this discrepancy, but it declined to change its published figure.
- 2.4 Notwithstanding this discrepancy, it remains the case that delivery fell considerably short of the required levels across the three monitoring years subject to the first housing delivery test measurement. It is not the case however that Haringey is a persistent under-performer in housing delivery terms.
- 2.5 **The Council's adopted Local Plan**³ covers the period 2011 to 2026. In line with the relevant targets within the London Plan 2016 and its predecessor document, the Strategic Policies DPD identifies a minimum strategic housing requirement of

² <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/authority-monitoring-report>

³ <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework>

19,802 homes over the plan period from 2011-2026. The delivery achieved so far against this is set out in Table 2 below.

Table 2: Haringey's annual housing delivery performance since 2011

	11/12	12/13	13/14	14/15	15/16	16/17	17/18
Overall Completions (net)	1,410	1,290	501	640	660	774	1,210
Cumulative Completions	1,410	2,700	3,201	3,841	4,501	5,275	6,485
Cumulative Target	820 (820)	820 (1,640)	820 (2,460)	820 (3,280)	1,502 (4,782)	1,502 (6,284)	1,502 (7,786)
Performance against target	590	1,060	741	561	-281	-1,009	-1,301

- 2.6 In the first four years of the plan period the borough over-delivered against the London Plan target, which at that time was 820 net dwellings per annum. As at the 31 March 2015 there had been surplus delivery of 561 dwellings in Haringey.
- 2.7 **In 2016 a new London Plan was published which increased the borough's annual target from 820 to 1502 new dwellings.** This represented an 83% rise and a step change in the required level of housing delivery required.
- 2.8 In response to the new London Plan and the requirement to significantly boost the delivery of homes, the Council took the proactive step of updating its Local Plan. The Council adopted alterations to its Local Plan Strategic Policies DPD in 2017 and adopted a suite on other DPDs in the same year comprising Site Allocations, Development Management Policies and Tottenham Area Action Plan documents.
- 2.9 The Local Plan sets out a comprehensive growth strategy for the borough including allocating sufficient land to achieve housing and other targets. However, despite this, actual delivery rates of housing have not matched those set out in the plan.

3. Sites monitoring

- 3.1 To understand the current and future position in respect to housing delivery in the borough information was gathered in relation to the pipeline of development sites. This process focussed on larger sites but with consideration also given to the pipeline of small sites in the borough.
- 3.2 As at 1 April 2018 **the Council's housing land supply** comprised the following, as set out in the AMR 2017/18⁴:

Table 3: Haringey housing land supply at 1 April 2018

Haringey supply of deliverable housing sites (2018/19 – 2022/23)	
Sites with Planning Permission (Started)	
Total (excluding small sites)	2092
Total	2288
Sites with Planning Permission / Subject to S106 (Not Started)	
Total (excluding small sites)	2291
Total	2569
Deliverable Sites	
Total (excluding small sites)	4,645
Total	5,787
Overall Total	10,644

- 3.3 In accordance with paragraph 73 of the NPPF a local planning authority is required to have a supply of specific deliverable sites sufficient to provide a minimum of five **years' worth of housing against their housing requirement set out in adopted** strategic policies. The supply of specific deliverable sites should in addition include a buffer. Due to under-delivery of housing in the borough in the past three years the required buffer for the Council is 20%. Table 4 below shows the calculation of **the Council's** housing land supply as at 1 April 2018.

Table 4: Haringey five-year housing land supply calculation as at 1 April 2018 (for Five-Year Period 1 April 2018 to 31 March 2023)

	Base Figure	Calculation	Cumulative
Annual target	5 years of 1,502 (7,510)	5 x 1502	= 7510
+Shortfall	+ 1,135 (existing shortfall)	+ 1135	= 8645
+Buffer	+20% (1,729)	+ 8645 * 0.2 = 1729	= 10374
Total requirement			10374
Supply			10644
Surplus		10644 - 10374 = 270	270
Years supply	5.13 years	5 + 270/(10374/5) = 5.13	5.13 years supply

⁴ <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/authority-monitoring-report>

4. Key issues and challenges

- 4.1 The London Plan sets ambitious housing targets for boroughs with no allowance for stepping up to the new target introduced in 2016. The amount and rate of housebuilding in Haringey therefore needs to increase significantly if the borough is to meet its housing delivery targets. Whilst the **Council's** evidence indicates that there are sufficient sites available to achieve the current targets, the achievement of the targets will still be a significant challenge given delivery rates have had to increase 83% per year from 2015 levels to meet the London Plan target. It is therefore important to be proactive in terms of thinking about, understanding and managing potential risks to future housing supply.
- 4.2 The scale of the challenge is proposed to increase even further in the future **following publication of the Mayor's draft London Plan in December 2017. This indicated that the Council's strategic annual housing requirement will increase to 1958 net additional homes per year (a 30% increase on the already challenging target of 1502 net additional homes per year and a 139% increase from 2015).** This is partially predicated on small sites (below 0.25ha in size) playing a much greater role in housing delivery. The Draft London Plan was examined in Spring 2019 and is scheduled for adoption in early 2021 therefore the increased delivery target could apply from the 2021/22 monitoring year.
- 4.3 Issues affecting delivery can broadly be broken down into two categories: general barriers to housing delivery and site-specific barriers to delivery. Key issues identified as affecting delivery in Haringey include the following:

General barriers

Availability of land/sites

- 4.4 Due to the built-up nature of the borough the supply of development land to deliver additional housing is limited.
- 4.5 The number of sites with scope to deliver significant amounts of additional housing is also limited. Large parts of the borough are suburban in character and have a Public Transport Accessibility (PTAL) rating of 1-2 meaning that they are unlikely to be suitable locations for major housing proposals.
- 4.6 **The Council's scope to alter the mix of sites allocated or increase the** amount of land earmarked for development where delivery falls below the target level is very constrained without severely compromising other objectives of the Local Plan such as supporting the local economy or preserving the historic environment.

Infrastructure improvements

- 4.7 The borough benefits from several areas of high public transport accessibility. These have been identified as having high potential to accommodate future growth. It is proposed that the accessibility of these areas will be enhanced further as a result of improvements to the Piccadilly underground line service and the

delivery of Crossrail 2. These improvements will help support increased housing densities and are a key opportunity for the borough meeting its growth targets. However, for infrastructure funding and other programming reasons, it is currently unclear when these improvements will take place. The uncertainty in this regard has potential to affect the speed at which key allocations get built out.

Viability and deliverability

4.8 **The Council's evidence indicates that** viability of residential development is currently challenging in certain locations and on certain types of development. This is primarily a function of development values rather than being a result of policy burdens or contributions required by the Council.

Site-specific barriers

4.9 There are a variety of issues which affect specific sites causing slower rates of homebuilding. These include:

- Legal issues (e.g. lease arrangements, covenants, rights to light)
- Complex landownership with multiple land parcels
- Infrastructure safeguarding (e.g. Crossrail 2)
- Site relies on other developments to come forward
- Infrastructure requirements
- Viability and planning obligations
- Land contamination
- Access to/from the site

4.10 A key barrier to **the timely delivery of many of the borough's larger development sites** is the presence of multiple landowners.

5. Current and future actions

The Borough Plan: Corporate prioritisation of housing

- 5.1 The Council has committed to significantly boosting housing delivery in the borough. The Borough Plan 2019-2023⁵) adopted by the Council in March 2019 identifies Housing as Priority 1 for the borough. It includes a specific objective (1a) to deliver as many new, good quality homes of all kinds as we can, in good quality **neighbourhoods, getting as close as possible to the Mayor’s target for Haringey of 1,502 new homes every year.**
- 5.2 Actions in the Borough Plan specifically for this objective commit the Council to:
- Monitor the supply of new homes through the planning system
 - Work in close partnership with housing associations and developers to secure investment in the new homes Haringey needs
 - Negotiate Planning applications and enforce Planning Policy to ensure the right quality and mix of homes
 - Deliver a wide range of high quality homes through our Tottenham and Wood Green programmes
 - Deliver estate renewal where estate ballots show clear resident support for the proposals
- 5.3 The Council is taking on a leadership role in relation to housing delivery. This involves taking a variety of actions to directly and indirectly improve housing delivery. However, the Council recognises that a step change in delivery will require a partnership approach and is therefore committed to working together with key partners to secure investment in the new homes that Haringey needs.

The Borough Plan: Yearly Delivery Plans

- 5.4 In order to ensure that the Borough Plan is delivered the Council has produced yearly delivery plans for each priority. A year one Housing Delivery Plan⁶ has recently been approved by the Council in July 2019 to ensure the Council is on target with its housing objectives. Table 5 sets out a selection of key milestones and actions under objective 1a of the adopted Delivery Plan.

Table 5: Housing Delivery Plan milestones and actions for objective 1a

Delivery priorities	High level milestone(s)	Years 2-4
Deliver new Local Plan	Incorporate / respond to new London Plan housing target following Inspector’s report due in September 2019 and	TBC

⁵ <https://www.haringey.gov.uk/local-democracy/policies-and-strategies/borough-plan>

⁶ http://www.minutes.haringey.gov.uk/documents/s110232/Appendix%203_Borough%20Plan%20Housing%20Priority.pdf

	adoption in early 2020	
	Commence Local Plan Review	Commence a new local plan with initial consultation and evidence base in 2020-21 Submission of Local Plan for examination post consultation
Make Haringey an attractive place to invest	Work with housing developers and Registered Providers of social housing (RPs) to secure investment in new homes Haringey needs	TBC
	Monitor the supply of new homes and publish Annual Monitoring Report (AMR) in Dec 2019	TBC
Deliver new housing through area based interventions	Consult on Wood Green area action plan (AAP) by March 2020	Publish Wood Green AAP for submission in 2020-21
	Estate renewal policies to be reflected in emerging new Local Plan (2019-20+)	Deliver estate renewal where estate ballots show clear resident support [for] proposals

Council homebuilding

- 5.6 The Council will be contributing to the future supply of housing in the borough through its Council Housing Delivery Programme. The Borough Plan contains a specific objective (1c) to deliver 1,000 new council homes at council rents by 2022.
- 5.7 The direct delivery of new council homes at council rents got underway in July 2019 after cabinet agreed a construction contract to build homes at the Templeton site. £500,000 funding has also been secured **from the Greater London Authority's** Home Building Capacity Fund to help build capacity to deliver a new generation of council homes. More information on the Council Housing Delivery Programme is available **on the Council's website**⁷.
- 5.8 **In order to help achieve the Council's corporate housing priority, including to achieve a step change in the number of new homes being built, the Council will be preparing a new Housing Strategy in 2019/2020.**
- 5.9 Table 6 sets out a range of the milestones and actions for objective 1c of the year one Housing Delivery Plan approved by the Council in July 2019.

⁷ <https://www.haringey.gov.uk/news/haringey-announce-exciting-plans-council-housing-delivery-programme>

Table 6: Housing Delivery Plan milestones and actions for objective 1c

Delivery priorities	High level milestone(s)	Comments and budget considerations	Years 2-4
Identify the land for new council housing	Cabinet approval of sites for the Council housing delivery programme by July 2019	Impact on HRA and GF of transfers to HRA.	Annual identification of new sites to build the sustainable programme
Ensure that finance is available to deliver the programme	GLA Building Council Homes for Londoners capital grant of £62.8m and Additional GLA Care and Supported Housing Capital Grant	Need to ensure delivery of the GLA programme to avoid loss of grant	Further grant applications
	Revised HRA Business Plan adopted, incorporating impact of new supply by March 2020	Impact on HRA of new build and acquisitions programme	Annual update to HRA Business Plan
Develop the capacity within the Council to deliver the new homes	Recruitment of housing delivery team in Jun 2019, staff development Summer 2019	GLA Housing Delivery Capacity Building Fund £546k	Continued recruitment in line with need to deliver housing targets
	Key housing delivery processes and procedures to be in place by Sept 2019		Development of additional specialist capacity (people and processes) as more complex sites are taken on
Deliver new Council homes via acquisitions and direct delivery	350 homes with planning consent and 260 homes with start on site by March 2020 (with 500 and 350 by May 2020)	Major capital expenditure	Annual targets to be set for permissions, starts and completions

Regeneration

- 5.10 The Council is committed to making Haringey a great place for all. To support this, it is **investing in making the borough's places better**. **Improvements being delivered** by the Council are focused on Tottenham and Wood Green, two areas with high potential to accommodate new homes.
- 5.11 To date, the Council's regeneration programme has helped unlock thousands of new homes in Tottenham. The Council has been very effective at leveraging public sector and private sector investment and will continue to monitor and bid for infrastructure and other development funding as and when opportunities arise. The **Council's interventions** have helped support an uplift in development values in Tottenham and are contributing to improved viability across the area which is

enabling development to start to come forward which might not otherwise have been deliverable.

- 5.12 In March 2017 the Council entered into a Strategic Development Partnership (SDP) with Argent Related. This partnership combines the land holdings of both Argent Related and the Council and is helping ensure the Council delivers its promise to create 5,000 homes, 4,000 jobs as well new commercial, retail, residential, leisure and entertainment spaces in Tottenham Hale. In 2018 the Council granted permissions for a number of major sites in the **partnership's** ownership which will begin to deliver on site within the next few years.
- 5.13 The Council is committed to ensuring difficult sites can come forward. This can be seen at the Wards Corner site in Seven Sisters, where Compulsory Purchase powers have been used to enable the Council and its development partner Grainger PLC to bring forward a comprehensive mixed-use development scheme including nearly 200 new homes.
- 5.14 The Council is currently preparing an Accommodation Strategy which will set out a strategy for the future use and development of Council owned sites in Wood Green including the delivery of a new civic hub. Flowing from the strategy will be the identification of a range of opportunities to deliver new homes.

Engagement with new London Plan

- 5.16 **In order to ensure that the borough's future housing targets are realistic and evidence based** the Council has been engaging in the preparation of the new London Plan. The Council made submissions to the consultation on the Draft London Plan in early 2018 and was represented at examination of the plan as part of a consortium of London Boroughs. Objections were tabled with regard to the proposed new housing targets and the methodology underpinning them, particularly for the small sites target The Inspector Panel report is due in late 2019 and the Council will continue to engage proactively up to the point to adoption in early 2020 including making representations in respect to any proposed Main Modifications with potential to affect the borough.

New Local Plan

- 5.17 **The Council's current Local Plan sets out a framework for growth and development** in the borough to 2026. In response to the likely adoption of the new London Plan in early 2020, the likelihood of an increased strategic housing target within that plan, and also the need to have an up-to-date planning framework to support a step change in housing delivery, the Council will be commencing work on a new Local Plan in 2019. The anticipated timetable for the review as reported to Regulatory Committee in July 2019⁸ is as follows:

- 2019-2020 – Local Plan scoping & evidence base commissioning
- March-May 2020 – Local Plan Issues and Options consultation
- Late 2020 – Draft Local Plan consultation (Regulation 18)

⁸ <https://www.minutes.haringey.gov.uk/ieListMeetings.aspx?Committeeld=721>

- 2021 – Proposed Submission Local Plan consultation (Regulation 19)
- 2021 – Submission to Secretary of State and Examination, consultation on modifications, and Examiner’s Report (Regulations 22-25)
- Early 2022 - Adoption

5.18 The new Local Plan timetable will be confirmed as part of a new Local Development Scheme (LDS) to be approved by the Council later in 2019. As part of the early stages of the new Local Plan the Council will carry out a Call for Sites to seek to identify additional land for housing and other growth needs. To support the **review there will also be an update to the Council’s Infrastructure Delivery Plan** to ensure that infrastructure is available to support planned growth and to identify any improvements that are needed to support/unlock new development. The Council will continue to maintain a strong housing and viability evidence base.

Wood Green Area Action Plan

5.19 In advance of the new Local Plan the Council is advancing the preparation of the Wood Green Area Action Plan. Wood Green is identified in the Local Plan as a Growth Area with potential to support a significant number of new homes and jobs. It is proposed that a Regulation 19 consultation on the Draft Area Action Plan will take place in early 2020 with submission in 2020-2021

5.20 The next steps for the Wood Green Area Action Plan are dependent on the final confirmation of the proposals for the Council’s own sites which are awaiting a final decision on the **Council’s emerging** Accommodation Strategy, for which further detailed feasibility work on two preferred sites for a new Civic Hub are being explored prior to a recommendation to Cabinet. The adoption of this Area Action Plan will give planning certainty on those sites identified within it, and it sets a proactive and positive framework for the delivery of additional housing, much of it at higher densities in accessible locations.

Supporting neighbourhood forums

5.21 The Council notes the potential for Neighbourhood Plans to contribute to increased housing supply within the borough. At present only one Neighbourhood Plan has been ‘made’ / adopted in the borough which is for the Highgate Neighbourhood Area. Neighbourhood Forums have also been designated for Crouch End and Finsbury Park and Stroud Green with a view to preparing Neighbourhood Plans for these respective areas. The Council will support these Neighbourhood Forums and any others that are subsequently designated to prepare Neighbourhood Plans and encourage a positive Plan for additional housing.

Brownfield Land Register update

5.22 In order to increase the supply of new homes in the borough it is important that as many potential housing sites have been identified as possible. To support this the Council will publish a Brownfield Land Register update by December 2019 which will give developers, particularly smaller housebuilders, more certainty and choice in what sites can be delivered for housing.

Development Management improvements

- 5.23 The Council has a high performing Development Management team and it is not considered that the speed or quality of decisions is a major barrier to delivery. In 2018/19 the Development Management Team determined 100% of Major Applications within the statutory time period or an otherwise agreed time period which puts the Council in the top quartile in London for Major Applications. The **Council's performance for Minor applications has improved and is top quartile in London at 98%**. Other applications have also improved and are now also top quartile in London at 99%. It is expected to be top quartile in all categories in the 2019/2020 financial year.
- 5.24 Significant improvements have been made on the length of time for determination of approval of details applications with the 2018/19 performance being 86% and the Council offers a Planning Performance Agreement specifically for conditions. The Council is proactive in seeking to resolve issues with internal and external consultees and have regular liaison with all of them. The Council have also undertaken an exercise of reviewing standard conditions with a view to reducing the numbers added to decision notices, including being pragmatic and flexible regarding trigger dates.
- 5.25 Council Officers are continuing to undertake Councillor training to help ensure decisions, particularly on major sites, are determined in accordance with the Development Plan and to ensure the Council is not taken to appeal unnecessarily.

Partial review of Community Infrastructure Levy (CIL) Charging Schedule

- 5.26 The Council will consult on a Draft Charging Schedule (DCS) as part of a partial review of its existing CIL Charging Schedule which has been in effect since 2014. The DCS will follow on from a Preliminary Draft Charging Schedule (PDCS) consultation undertaken in 2017 and will propose to increase CIL rates for some parts and uses of the borough. This will help fund infrastructure to support development across the borough, whilst not setting the new rates at such a level that would have a negative overall impact on development viability. The DCS will progress to examination in 2020 and take effect from 2021.

Annual Authority Monitoring Report (AMR)

- 5.27 The Council monitors a number of key planning indicators, including the supply of new homes, through its AMR. The Council will publish its 2018/19 AMR in December 2019. Consideration will be given to how the AMR can best be purposed to support future housing delivery in the borough.

Monitoring of development pipeline

- 5.28 Given that the Housing Delivery Test is a recent introduction, the Council has not yet had to chance to engage proactively since its introduction with all major developers in the Borough to understand all the key challenges facing them not identified above. However the Council has engaged proactively with developers running sessions specifically to seek views on how development can be speeded up. A further session is planned for the Autumn together with our annual Agents

Forum in early 2020. Ahead of this the Council has already started contacting developers and landowners in the Borough as a priority, particularly those **identified in the Council's 5 Year Housing Land Supply, to get a better** understanding of any issues that may be precluding development from coming forward, and to engage to try and accelerate delivery. This may be achieved through the Council helping in site masterplans, or revised site allocations as part of the new Local Plan or using other powers such as Compulsory Purchase Order **where appropriate. Given the Council's ambition to deliver 1,000 new** council homes in the borough, the Council may be able to speed delivery by acquiring properties on schemes, which may help speed delivery by providing more certainty to the developer regarding sales.

6. Implementation and monitoring

- 6.1 Table 7 below sets out the key actions the Council is implementing to help boost housing delivery in the borough

Table 7: Key implementation actions in relation to housing delivery in the borough

Key Actions for Implementing		
Action	Team Responsible	Delivery Date
<p>New Local Plan The Planning Policy Team is about to commence preparation of a new Local Plan. The new Local Plan will plan for the increased housing target (the exact number is still to be confirmed pending the outcomes of the Examination of the draft London Plan) A new Local Development Scheme (LDS) will be published in Q4 2019 setting out the timeframe for this process.</p>	Planning Policy	Q1 2022
<p>Wood Green Area Action Plan In advance of the new Local Plan the Council is advancing the preparation of the Wood Green Area Action Plan. It is proposed that a Regulation 19 consultation on the Draft Area Action Plan will take place in early 2020 with submission in 2020-2021</p>	Planning Policy	2019-2021
<p>Supporting Neighbourhood Forums The Council will support existing Neighbourhood Forums and any others that are subsequently designated to prepare Neighbourhood Plans and encourage a positive Plan for additional housing.</p>	Planning Policy	Ongoing
<p>Brownfield Land Register update The Council will publish a Brownfield Land Register update by December 2019.</p>	Planning Policy	Q3 2019
<p>Monitoring of development pipeline The Planning Policy Team will contact all applicants, agents and developers who have been granted planning permission on major sites to find out if there are any issues preventing the delivery of housing</p>	Planning Policy	Q1 2020
<p>Build out rates The Council will continue to monitor build out rates and obtain information on barriers to delivering housing. A new London Development Database due to be introduced in Q1 2020 should significantly aid in this monitoring, and this will feed directly into the AMR</p>	Planning Policy	Q1 2020
<p>Call for sites A new 'Call for Sites' as part of the Local Plan will be undertaken to identify suitable and deliverable land for housing that has not already been identified</p>	Planning Policy	2020
<p>Evidence Base review Including Employment Land as part of the Local Plan review. This will enable the Council to assess</p>	Planning Policy	2019-2020

the continued suitability of employment land for that purpose, and to explore options for co-locating residential and employment uses, and industrial intensification to potentially release land for additional housing. A small sites study is also being considered.		
Duty to Cooperate As part of the Duty to Cooperate, the Council will work with its neighbouring authorities to produce a Statement of Common Ground. The Statement will focus on strategic cross-boundary issues such as housing, it will note where agreement has and has not been met.	Planning Policy	Q2 2020
CIL spending The Council will continue to improve local and strategic infrastructure using CIL to support housing growth by providing the necessary infrastructure.	Planning Policy	Ongoing
CIL Partial Review The Council will consult on a Draft Charging Schedule (DCS) as part of a partial review of its existing CIL Charging. The DCS will progress to examination in 2020 and take effect from 2021.	Planning Policy	2019-2020
Annual Authority Monitoring Report The Council will publish its 2018/19 AMR in December 2019.	Planning Policy	Q3 2019
Determination times Continue to determine applications in accordance with current National and Local Planning guidance and thus remain a top performing Council for application determination time	Development Management	Ongoing
Conditions To continue to ensure that conditions that are placed on planning applications are necessary and the trigger points are appropriate. To continue to determine these approvals as quickly as possible	Development Management	Ongoing
Developers To continue to seek opportunities to hear from Developers their views as to why development is not being implemented.	Development Management	Ongoing
Member training Topics to be identified but likely to include 'delivering high quality, high density development', small sites, and suburban densification and viability.	Development Management	Ongoing
Planning Performance Agreements (PPAs) and Quality Review Panel (QRP) The Council offers planning performance agreements (PPAs) for major development proposals and discharge of conditions on major applications, and has a Quality Review Panel for design. The uptake of such services will continue to be pushed to ensure developers receive high quality advice that enables schemes that are policy compliant to come forward quickly with dedicated resources and obtain permission.	Development Management	Ongoing
Council Delivery of Council Housing	Housing and	Ongoing

Target of 1,000 units, plus delivering small schemes on infill sites and within any estate regeneration, subject to ballot. Monitoring through the Borough Plan and Housing Priority Board that have been set up in 2019.	Regeneration	
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- 6.2 It will be extremely challenging for Haringey to deliver a 138% increase in its annual housing target versus the 2015 policy position, especially given that the London Plan does not allow for a stepped housing target. The Council is already undertaking a great deal of work to facilitate development and will continue to do so. **However, it is outside the Council’s control to determine how long (or if even if) a developer implements a planning permission, and then the timeframes for build out rates.** There are no significant incentives or disincentives for developers to build out to a rate needed by the Council, this will always be borne out by market conditions and likely profit levels required by the developer, which in some cases a **slow build out rate to ‘drip feed the market’ may be desirable.**
- 6.3 The actions within this plan will go some way to help increase and accelerate housing delivery, particularly through an updated Local Plan with new Site Allocations, **and through the Council’s own delivery of sites. However, at this stage, given the Housing Delivery Test steps up to 75% as the target for cumulative 3-year delivery in November 2020, the Council highlights that it is unlikely to meet this target immediately given the lag between actions and the implementation of actual permissions as a result.**
- 6.4 This Action Plan will be monitored and reviewed by the Planning Policy Team on an annual basis and published online.
- 6.5 Monitoring information will continue to be collected from a range of sources such as the AMR, the Haringey Borough Plan, the London Development Database, appeals monitoring along with any other relevant documents. **The ‘Actions’ will be implemented by those services indicated in the ‘Team Responsible’ column.** Actions will be updated where necessary and new actions will be added in response to any changes in legislation, Government policy and practice guidance.