

Representor no. 9; ANNE GRAY

Additional submission in response to the Inspector's Draft Matters and Issues; Alterations to Strategic Policies.

New matters which have arisen since March 4

I would call attention to the changes described below in the context of the Plan. These are relevant in so far as the Plan is surely not sound if:-

- a) it does not take into account relevant changes in the housing market and regulatory environment (soundness test points 33,34 and 35); and
- b) it must rely on evidence which is up to date and convincing (soundness test point 4), and
- c) the assumptions must also be reasonable and justified (soundness test point 6)

Since March 4 there are several new factors in the Plan context. The table below sets out how they may be considered to affect its soundness:-

<p>1) the new Mayor of London, Sadiq Khan, has stated that he wishes to revise the London Plan and introduce a 50% affordable housing target.</p> <p>2) The London Assembly is clearly pushing for revised affordable housing targets as well, having passed a motion on July 6 which says:- <i>'This Assembly therefore calls on the Government to provide sufficient funds in future spending reviews to meet the need for new social housing in London, and calls on the Mayor to bring forward a housing budget and a revised London Plan and Housing Strategy that will continue to provide more social housing.'</i></p>	<p>These events call into question whether a 40% target is reasonable and justified, at least for the fourth and subsequent years of the period by which time a revised plan is likely to be in force.</p> <p>The Plan must be deliverable under all the condition likely to be encountered and foreseeable within its timeframe. Thus it would surely pass questions/criteria 33,34 and 35 in the 'soundness' questionnaire unless it specifies some flexibility of affordable housing targets in the direction of 50% if and when the London Plan as whole changes.</p>
<p>3) There is important new national legislation, in the form of the Housing and Planning Act 2016, provisions of which include:-</p> <p>a) much higher rents for social housing tenants on middle incomes, probably leading to an increased use of the 'right to buy' and therefore further erosion of the social rented housing stock as well as greater diversification of tenures in existing estates.</p> <p>b) a 'right to buy' for housing association tenants which will have similar effects</p>	<p>These legislative changes make it more important than ever to increase the growth target for the social rented stock in order that the Borough Plan may achieve policy DM10 C ('resisting the loss of all existing housing, including affordable housing.... unless...replaced with at least equivalent new residential floorspace'). Where Homes for Haringey tenancies are replaced with housing association ones, the latter may not be 'affordable' for long in view of the increased flexibility given by the new legislation to raise rents and to permit the right to buy. It is difficult for the Plan to satisfy points 37-39 of the 'soundness' questionnaire in question unless 'equivalent' is more precisely defined – does this mean equivalent in terms of tenancy type/length of tenant security of tenure, or rent level?</p>
<p>3) House prices, having risen hugely between 2012 and spring 2016 (N15; 36% and N17 66% according to statistics from the Zoopla property sales web site), are now said to be dipping since the 'Brexit' vote. In particular media reports suggest a fall in the demand for high value apartments from foreign investors. This will make land cheaper in the medium term and make 'affordable' housing more feasible for housing associations acquiring land. However it is also bad news for a local authority seeking to sell land in order to achieve estate 'densification' with addition of large numbers of private-rented or owner-occupied dwellings within existing estate envelopes.</p>	<p>This market development calls into question the viability of the 'single development vehicle' with 50% private sector control and funding which Haringey Council envisages will take forward estate renewal and major site developments. In terms of the 'soundness' test point 35, there is a need to protect against market risk by putting greater emphasis in the plan on smaller developers, including non-profits, and several additional ways of securing lower void rates and better use of existing buildings for residential growth, as I spelled out in my March submission which you have.</p>
<p>4) Whereas in response to Maria Jennings (respondent 8 on Site DPDs in March) the Council stated 'During the preparation of the Local Plan, a</p>	

viability study was commissioned which indicated that achieving 50% affordable housing across the borough on deliverable sites was not viable,' the facts remain that:-

- a) the increase in house prices between 2012 and May 2016, which exceeded all expectations, now gives developers opportunity to make more profit than before on 'non-affordable' housing with which to cross-subsidise 'affordable' units
- b) however the market prospects for high-value housing aimed at high-income buyers are now poorer than they were before the BREXIT vote, which may lead developers to revise their expected profit margins especially in a period of expected lower-than-ever or even negative interest rates.
- c) an expectation that the London Plan will be revised in favour of higher 'affordable' targets changes the profitability environment across all London boroughs, creating a 'level playing field' for all of them in attracting private investment which did not exist when several representations were made in favour of more affordable housing in March. This expectation of a plan revision right across the city will reduce the risk that if developers feel they are not getting a sufficiently profitable prospect in Haringey, they will instead seek land purchase and planning permission in another borough.

These changes in the market environment call into question the soundness of the Plan under point 4 of the soundness test (evidence must be up to date and convincing) and point 6 (assumptions must be reasonable and justified)

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Response to the Inspectors 'matters and issues' in relation to the Site Allocation DPD; SA 26:-

SA26; 'is the requirement for a new health centre supported by evidence ?'

I would refer you to a report on the NHS Strategic Premises Development Plan presented to the Haringey Health and Wellbeing Board on June 23, which showed a very substantial shortage of GP practices particularly in the east of the borough, forecast to worsen as the new housing developments bring in more people over the coming decade. Although SA26 is in N8, it is on the margin of N15 where the shortage is greatest, and Green Lanes is singled out in the report as a priority area. A new health facility on the Hawes and Curtis site is therefore badly needed.

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Response to the Inspectors 'matters and issues' in relation to the Site Allocation DPD

Matter 2 – point 3; 'social.... requirements of the site allocations...'

The above-mentioned report, as well as research I myself have done about the unusually high and rising average number of patients per GP in Tottenham, suggests that a grave shortage of medical treatment opportunities will result if more space is not allocated for doctors' surgeries.

Inspector's Note 3 on Site Allocations DPD

The soundness of the plan, on grounds of internal consistency, may be called into question if developers' offers to deliver more dwellings than the plan conflict with other DM policies, for example, DM19 A and B, DM20 F, DM 21 C and E, DM 24 and 25. Although site-specific conflicts will be a matter for consideration at planning application stage, it would lead to misleading expectations for both developers and the council, thus compromising the deliverability of the plan, to write into the target setting process a significant number of proposals which are likely to conflict with DM policies. An example has arisen in relation to the Keston Centre (SA60) where the developer now proposes 134 dwellings compared to the DPD's stated 70. If this increase in unit numbers requires blocks as high as 5 storeys, it may impact adversely on the amenity of the adjoining park. To avoid the risk of cramming sites in order to achieve higher numbers, the Council's conservative estimates of site capacity should on the whole be preserved.