

# Public Examination into the Haringey Core Strategy June 2011

## Indicative Matters and Issues for Examination

### Hearing 1

#### Matter 2

*Is the Core Strategy's approach to housing provision deliverable, sufficiently justified and consistent with the London Plan and national planning policy in Planning Policy Statement 3 (PPS3)? Is the Core Strategy effective in meeting the varied housing needs of the borough?*

- i The Core Strategy approach to housing provision is based on the principles of sustainable development, as set out in Planning Policy Statement 1 (PPS1), and local spatial planning, as set out in PPS12. The 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 more specific sites.
- ii The approach to housing is deliverable and justified as it clearly sets out the borough's housing needs and how these will be met over the plan period; it is consistent with relevant guidance and strategy; and is supported by robust evidence from participation and up to date research studies.
- iii The approach is consistent with the housing policies in the London Plan and is in line with the Government's housing objectives as set out in PPS3. Haringey's housing policy adopts housing figures, densities and definitions in the London Plan which ensures a coherent approach to housing delivery across the region. The Council's approach is based on the overall priorities of PPS3 to deliver a choice of high quality designed, affordable, and suitable housing to meet the needs of the local community in locations where residents want to live.
- iv The Core Strategy Housing policy 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.

1. Issue 2.1

*Is the Core Strategy in conformity with the London Plan and its draft replacement? Housing target consistent? Evidence of deliverability on 820 units/yr as opposed to 680? Is there flexibility within the Core strategy to accommodate any change to the regional housing targets which may emerge in the short (or medium) term?*

- 1.1 It is considered the Core Strategy is in conformity with the London Plan and the Draft Replacement London Plan (DRLP).
- 1.2 Section 3A of the **London Plan (2008) (consolidated with Alterations since 2004)** sets out the Housing policies for London.
- 1.3 Policy 3A.1 Increasing London's supply of housing and table 3A.1 shows the overall London and individual borough targets for housing projections for years 2011/12 – 2020/21. Haringey's ten year target is 6,800 (annual 680). SP2 states the Council's intention is to meet or exceed this target.
- 1.4 The Core Strategy meets the requirements of Policy 3A.2 Borough housing targets in SP1 and SP2. SP2 states an aim to exceed the target, while SP1 identifies suitable locations for new housing development, in line with the growth areas identified in the London Plan, in terms of type of development, housing requirements and impacts on the locality.
- 1.5 SP2 adopts the residential density ranges in Table 3A.2 Density matrix (as part of Policy 3A.3 Maximising the potential of sites) as Haringey's own density requirements (Please see Issue 2.5 paragraph 5.1 for additional proposed minor change).
- 1.6 SP2 is in line with Policy 3A.4 making better use of existing housing by setting an annual target for bringing back into use 77 empty properties. This is monitored on an annual basis through the Annual Monitoring Report (AMR). Additionally, the Development Management DPD will address the issue of bringing empty properties back into use in greater detail.
- 1.7 Policy 3A.5 Housing choice states that boroughs should identify the full range of housing needs within the area. SP2 will ensure a full range of housing to meet the needs of Haringey's diverse community. This includes a range of tenures, a range of unit sizes suitable for different types of households, and provision of housing which meet specific needs such as provision of 10% wheelchair housing.
- 1.8 SP2 complies with Policy 3A.6 Quality of new housing provision by ensuring that good design quality and sustainability will be required for

all new homes. SP2 adopts density matrix in Table 3A.2 and incorporates security and safety in design and child play space standards in line with the London Plan and national policy.

- 1.9 SP2 defines affordable housing in line with Policy 3A.8 Definition of affordable housing, and PPS3. Amendments will be made to incorporate the changes to the definition of affordable housing as made to PPS3 February 2011. (Please see Issue 2.11, paragraph 11.2 for proposed minor change).
- 1.10 The Core Strategy's housing policy sets a strategic affordable housing target in line with London Plan Policy 3A.9 Affordable housing targets, as well as an additional target for smaller sites. The targets set in SP2 are based on robust evidence as set out in the Affordable Housing Viability Assessment (AHVA).
- 1.11 The Council aims to maximise the provision of overall housing and affordable housing in the borough. It is recognised that market housing is essential in the provision of affordable housing therefore in line with Policy 3A.10 Negotiating affordable housing in individual private residential and mixed-use schemes the Council will take account of viability of developments and will apply targets flexibly.
- 1.12 Policy 3A.11 Affordable housing thresholds states boroughs should apply affordable housing targets on sites with capacity of 10 or more housing units. SP2 applies the 50% affordable housing target on sites of 10 units or more. In addition, a target of 20% will be applied to sites of 9 units or less as recommended by the AHVA (2010) (Please see Issues 2.8 and 2.10 for further details).
- 1.13 In line with London Plan Policy 3A.12 Partnership approach and sub-Regional Implementation Frameworks Haringey works in partnership with the North London housing sub-region and London wide region. Haringey contributed to the London wide SHLAA 2009 and Haringey was a participating borough in the North London sub-region SHMA (2011).
- 1.14 SP2 seeks to meet all housing needs across the borough. In line with Policy 3A.13 Special needs and specialist housing further details for different types of specialised housing will be set out in the Development Management DPD (DM DPD).
- 1.15 In line with Policy 3A.14 London's travellers and gypsies SP3 ensures protection of existing sites. The emerging Site Allocations DPD aims to identify shortfalls in accommodation and identify suitable location for new sites.
- 1.16 The Core Strategy sets out the Council's aim to make full use of Haringey's capacity for housing and will ensure no loss of existing

affordable housing in line with Policy 3A.15 Loss of housing and affordable housing. Further detail of the protection of existing housing will be included in the emerging DM DPD.

- 1.17 The emerging DM DPD sets out how the Council will protect existing hostels and shared accommodation in line with Policy 3A.16 Loss of hostels, staff accommodation and shared accommodation.
- 1.18 **The Draft Replacement London Plan (DRLP) (October 2009)** sets out planning policies for London from 2011 – 2031. A number of changes in the DRLP will have an impact on SP2 and SP3, these include the following:
  - 1.19 Policy 3.3 Increasing housing supply states that the reviewed annual target of additional new homes in London is 33,400. This means that Haringey's ten year housing average target is 8,200 (2011/12 – 2020/21) until replaced by a revised London Plan target. The Council has accepted this revised target and recognises that Haringey has the capacity to exceed this target; this is evident through the Housing Trajectory. (Please see Section 2 of Factual Statement 1 for further detail on Haringey's housing capacity).
  - 1.20 Policy 3.4 Optimising housing potential and Table 3.2 set out the density and design requirements for housing development. SP2 will adopt these density standards as its own.
  - 1.21 Policy 3.5 Quality and design of housing developments sets out minimum space standards for new development in Table 3.3. The Core Strategy will adopt these standards along with the emerging London Housing Design Guide as its own.
  - 1.22 Policy 3.8 Housing choice states that LDFs should take account of the various housing needs of the local population and ensure suitable housing is provided to meet these needs this includes wheelchair housing, Lifetime homes, a range of tenures, housing designed for a growing older population and student housing. The emerging DM DPD will include guidance on meeting the need for specialised housing.
  - 1.23 Policy 3.9 Gypsies and Travellers (including travelling show people) – the Minor alterations to the consultation draft Replacement London Plan (September 2010) states that there is no longer a requirement for local authorities to include targets for additional Gypsy and Traveller pitches in their LDFs, but instead identify need when it arises through other DPDs. (See Issue 2.14 for further detail)
  - 1.24 Policy 3.10 Mixed and balanced communities encourages a mix of tenures and large and small scale developments to foster social diversity and reduce the occurrence of homogenous communities.

SP2 and supporting text encourages a range of tenures to ensure mixed and balanced communities.

- 1.25 Policy 3.11 Definition of affordable housing sets out the characterisations of social rented housing and intermediate housing. SP2 complies with these definitions and will incorporate addition of affordable rent tenure as set out in PPS3 amendment.
- 1.26 Policy 3.12 Affordable housing targets sets out the number of additional affordable homes expected to be built annually in London over the plan period, this will be an average of at least 13,200. Within this the Plan seeks to ensure 60% is social housing and 40% is intermediate housing. Based on local evidence SP2 seeks to maximise the provision of affordable housing by applying a 50% affordable housing target to developments of 10 housing units or more and a 20% affordable housing target on sites of 9 housing units or less which will contribute to the overall London affordable housing target. Within the Haringey target the Council will seek 70% social housing and 30% intermediate housing based on recommendations from the AHVA 2010.
- 1.27 SP2 is in line with Policy 3.13 Negotiating affordable housing on individual private residential and mixed use schemes, taking account of changes to policies listed in Policy 3.13.
- 1.28 Policy 3.14 Affordable housing thresholds sets out the requirements for boroughs to seek affordable housing on sites with a capacity for 10 or more units. It also states that boroughs should seek a lower threshold when appropriate. Based on local evidence SP2 seeks to maximise the provision of affordable housing by applying a 50% affordable housing target to developments of 10 housing units or more and a 20% affordable housing target on sites of 9 housing units or less.
- 1.29 Policy 3.15 Existing housing supports the maintenance and enhancement of London's existing homes and resists the loss of existing housing without suitable replacement. SP2 supports the maintenance of existing housing; bringing empty properties back into use makes up the overall annual target for additional homes; high quality conversions are recognised as an important source of additional housing; and the policy seeks to ensure no loss of affordable housing. The emerging DM DPD will contain further detail on protecting and improving existing housing stock.
- 1.30 It is considered that SP2 is flexible to changes in housing targets, in line with DRLP Policy 3.3, and as evident through amendments made in response to representations received from the GLA at consultations stages May/June 2010 and November/December 2010. The GLA recommended reference to the increased housing target in the policy

and not just the supporting text. SP2 was amended to reflect these comments. This change also reflects guidance in paragraph 4.15 of PPS12 ensuring a long term view to housing supply and providing some flexibility.

## 2. Issue 2.2

***Is the evidence base to the housing policies robust and credible? How does this relate to the PPS3 and its associated guidance? To what extent is the content of PPS1 and 3 particularly satisfied by the Core Strategy?***

- 2.1 It is considered the evidence base for SP2 and SP3 is robust and credible and it complies with the requirements of PPS 3. Please see Factual Statement 1 Section 2 in reference to consistency with PPS3. In addition:
- 2.2 ***Planning Policy Statement 1 (PPS1): Sustainable Development (2005)*** sets out the strategic approach for delivering sustainable development. It states that the planning system should be based on the core principle of sustainable development. SP2 promotes sustainable development by ensuring an integrated approach to housing taking account of the social, environmental and economic impacts of housing provision over the plan period.
- 2.3 PPS1 states the importance of high quality, inclusive and accessible design of whole developments and individual buildings to ensure everyone lives in a decent home meeting the needs of diverse existing and future communities. SP2 and SP3 promote high quality design and access to appropriate services and facilities.
- 2.4 PPS1 promotes mix-use and integrated development, and sufficient and suitable land supply in appropriate locations to meet expected needs of housing and other land uses. SP1 and SP2 draws on information from the SHLAA and the London Plan to establish a suitable land supply which will deliver the required housing provision in the borough.
- 2.5 ***Planning Policy Statement 12 (PPS12): Local Spatial Planning (2008)*** sets out the nature of Core Strategies highlighting their strategic and long-term role in guiding development. Core Strategies should be adaptable and flexible and should not include site specific detail which may date too quickly. Haringey's Core Strategy identifies broad locations for housing development and is supported by evidence which identifies more specific sites.
- 2.6 The evidence base which supports SP2 is in line with the guidance set out in PPS12. It is proportionate to the size and scope of the plan, it is

relevant to the policies, and it is as up to date as possible, keeping in mind the recent changes in national and regional legislation.

### 3. Issue 2.3

*To what extent, and in what ways, was the chosen spatial distribution of housing considered against alternatives? Is the spatial distribution of intended housing over the plan period clear? Is there consistency within the housing figures contained within SP1 and elsewhere in the plan?*

- 3.1 The Sustainability Appraisal (SA), carried out by Hyder Consultants, compared and appraised each of the proposed options and policies throughout the development of the Core Strategy.
- 3.2 The SA assessed the Core Strategy's objective for Housing against two policy options.
- 3.3 The chosen policy option aims to meet housing need in the borough where growth is concentrated, in areas of change and at sustainable locations, and recognise the differences in character in the borough by providing a higher proportion of affordable housing at appropriate locations.
- 3.4 The alternative option for Housing, as put forward in the Preferred Options document and assessed by the SA, proposed 'to provide sufficient housing in terms of numbers, the range and type to meet the needs of the borough's population'. This option was considered a blanket approach to meeting housing needs, and did not distinguish between location, type of housing needed and the potential impacts on the locality where major developments would be provided, and therefore was rejected.
- 3.5 Growth was recommended to be concentrated within areas of housing and employment rather than spread across the borough to ensure that other sustainability objectives are not adversely affected, and to ensure that development is located where it would not have a negative effect on the character of the area.
- 3.6 Large developments require careful spatial planning to ensure that sustainability objectives are not compromised. For example, the impact and suitability of larger family homes depends on their location, access to facilities and services and their effect on environmental aspects.
- 3.7 It is considered that the spatial distribution of housing over the plan period is clear. The supporting text in SP2 sets out the role of the Housing Trajectory in how it shows which sites are expected to come forward over the plan period. The Housing Trajectory list of sites and Figure 3.7 in the Core Strategy shows clearly the spatial distribution of

the housing development over the next 15 years (see Section 2 of the Factual Statement 1 for further detail on housing capacity).

- 3.8 The housing figures are consistent throughout the document. A number of changes and up dates have been made in the Schedule of minor and focused changes and in Issue 1.4.

#### 4. Issue 2.4

***Does the Council have a demonstrable housing land supply consistent with PPS3? What reliance is made upon windfalls? Where is the evidence?***

- 4.1 The Council has a demonstrable housing land supply evident through the Housing Trajectory, in line with paragraphs 54 and 55. Please see Factual Statement 1 Section 2 for further detail.
- 4.2 The Council have a low reliance on windfalls, and can meet housing targets over the plan period through identified sites. The Council's 15 year housing trajectory shows that the majority of Haringey's housing supply is made up of conventional units i.e. developed and redeveloped sites and conversions from residential and non residential properties.

#### 5. Issue 2.5

***What are the density characteristics of Haringey for the application of SP2 bullet point 1? Are these intended to be shown on the proposals map? How will planning proposals be resolved in such regards?***

- 5.1 To ensure clarity in relation to Haringey's density characteristics, the Inspector is asked to consider the following proposed minor amendment, incorporating the proposed minor change, submitted March 2011, to paragraph 3.2.8:

*'The Council will expect all new development to be built to the highest quality standards and will assess housing densities in planning applications in line with those set out in the London Plan Density Matrix (Table 3A.2) while taking account of Haringey's urban, suburban and central density characteristics.'*

*While most of the traditional 19<sup>th</sup> Century development in Haringey can be characterised as a mixture of detached and semi-detached housing creating a distinctive suburban character, proposed residential development is expected to be urban in character with a density range of 200-700 hr/ha in line with the density matrix table in the London Plan.*

*Higher densities, up to 1,100 hr/ha, will be acceptable provided the proposed development is in a central area with; PTAL levels of 4-6, and predominantly comprise of flats; located in an identified area of growth; is within a mixed use scheme; and where a planning brief for the site or a Local Development Document (e.g. an Area Action Plan) has been adopted and recommends higher densities.*

*The density ranges set out in the London Plan will be applied flexibly in light of local circumstances and the Council will adopt a 'design-led' approach to density.'*

- 5.2 It is not intended to show Haringey's density characteristics on the Proposals Map. Characterisation studies will be carried out for the proposed AAPs, detailing the density characteristics of the borough.

## 6. Issue 2.6

***Is the CS's consistency with the Council's Housing SPD (Section 9) clear?***

- 6.1 Haringey's Housing Supplementary Planning Document (SPD) was adopted in 2008. The SPD includes guidance on housing standards and range of unit sizes. The Council will continue to use the standards set out in the SPD until it is replaced by the London Housing Design Guide, for design and space standards, and the Core Strategy and DM DPD for other policy areas.
- 6.2 The North London SHMA findings show that converted and shared housing will be important in Haringey for small households on low income that are unlikely to be a priority group for social housing. The Council recognises conversions are an important source of housing in the borough.
- 6.3 The Inspector is asked to consider the following further proposed minor change to replace paragraph 3.2.13:

*'The Council recognise converted and shared houses as an important source of housing in the borough, especially for small and low income households. Conversions and Houses in Multiple Occupation (HMOs) will have to meet all design and space standards set out in the Housing SPD (or the London Housing Design Guide when adopted) and other relevant design guidance, in terms of minimum floorspace, habitable rooms, layout, dwelling mix, amenity space and privacy, and have a positive impact on the amenity, streetscape and character of the surrounding area of the development. Further detail on conversions and HMOs will be contained in the Development Management DPD'*

7. Issues 2.7 and 2.12

***2.7. What are the needs referred to within para 3.2.16 (need to cross reference SHMA)?***

***2.12. How will the details of family housing be delivered? Does SP2 address adequately issues of family housing need throughout the borough?***

- 7.1 The needs referred to in paragraph 3.2.16 are family housing needs. To ensure clarity on how SP2 addresses these needs a post submission change relating to family housing has been proposed to replace paragraph 3.2.16. It reads as follows:

*'In order to encourage mixed and balanced communities, the Council will aim to ensure that an adequate mix of dwelling sizes is delivered within new developments, while protecting existing family housing.'*

*The lack of family housing in Haringey has resulted in a significant issue of overcrowding. The demand for family housing and characteristics of overcrowding differ by tenure and ethnic origin, with some groups seven times more likely to be living in overcrowded housing than white British households (North London SHMA 2010). Low to median income households with large families are also likely to be more affected by overcrowding due to the lack of choice of available affordable family homes. Responding to these issues is a priority of the Council.*

*Along with the provision of new and affordable housing, the Council will aim to meet the need for family housing and alleviate the problem of overcrowding through a number of other approaches such as: assisting smaller households living in overcrowded properties to find their own home; and assisting residents living in underoccupied properties to find more suitable accommodation.'*

- 7.2 Family housing will be provided through the private sector and Registered Providers. The performance of housing completions will be assessed in the Annual Monitoring Report.

8. Issue 2.8

***How much affordable housing (and of what size/tenure mix) is required and how will it be delivered? Targets needed for affordable housing – adequate in addendum?***

**Affordable Housing Requirement**

- 8.1 Please see Section 2 of Factual Statement 1 and Issue 2.11, paragraph 11.6.

## **Affordable Housing Delivery**

- 8.2 The recent amendments to PPS3 for the reform of social housing include the introduction of Affordable Rent model at 80% of market rent.
- 8.3 Haringey is currently developing a strategy in light of these amendments that is both responsive to local housing needs and incomes and provides sufficient surety of income to enable the Council's housing association partners to continue to build and meet the housing needs in the borough.
- 8.4 The Council encourages all affordable housing to be owned and managed by one of the Council's Registered Provider partners and has adopted a Partnership Agreement which it encourages all registered providers to sign up to.
- 8.5 The Council will require developers and Registered Providers (RPs) to meet affordable housing targets and the tenure split except where a strong case can be made and evidence is provided to show that this is not viable. The Council will actively be seeking developers and RPs to set out how they can contribute towards the Council's affordable housing objectives on a site by site basis and over the planning trajectory period.
- 8.6 This 'open book' approach is in keeping with the requirements set out in the HCA's Framework Document and will help the Council determine the appropriate level of affordable housing both in terms of quantum and rent levels.
- 8.7 As a registered provider itself, the Council is exploring the opportunities available to it to develop, own and manage its own new stock
- 8.8 The Council will consider other providers who comply with PPS 3 and have attained Homes and Communities Agency Accreditation for managing affordable housing.

## **Affordable Housing Targets**

- 8.9 The AHVA (2010) considered whether there is evidence in economic viability terms to support the applications of different thresholds, proportions and tenure mix in different parts of the borough.
- 8.10 The study showed that viability varies sharply across the borough. Both high and medium value areas (typically Muswell Hill and Crouch End, and Wood Green and Finsbury Park, respectively) can support 50% affordable housing with grant, with scope for increasing the

proportion of affordable housing and/ or reducing the amount of grant in the highest value areas. In the mid market areas, there may be some scope for reducing grant levels as and when the market recovers. In the lowest value areas (generally the East of the borough), where viability fails due to poor private market values, an increase in affordable housing with grant improves viability, so there is no case for a reduction in proportion, but a strong case for sustaining or increasing grant rates.

- 8.11 Based on the results of the modelling, the study recommends a borough wide policy, with provisions for exceptional exemptions where developers are able to demonstrate that the sales values being achieved are not high enough to support the target affordable housing ratio. Most of these exemptions would be expected where there are exceptionally high residential existing use values (typified by Highgate area (N6)) or on sites where there are exceptionally high remediation, or infrastructure costs (e.g. Haringey Heartlands).
- 8.12 It is considered that if the policy were to be varied across the borough, the overall level of need is such that it would have to exceed 50% in some areas – an unattractive proposition in market terms, and not in line with the SP2 aim to create mixed communities. With the current level of need (see Section 2 of Factual Statement 1) - and as long as there is a demand for affordable housing throughout the borough, the case for a borough wide policy remains strong.
- 8.13 In addition, in cases where the Council envisages significant numbers of small windfall sites coming forward (i.e. sites below ten units) the study recommends a sliding scale policy for site threshold. Based on this recommendation and in an effort to maximise affordable housing provision the Council proposed the following amendment to SP2 in the proposed submission document (additional Regulation 27 consultation Nov/Dec 2010):

*‘Schemes below the ten unit threshold will be required to provide 20% affordable housing on site, based on habitable rooms, or provide financial contributions towards affordable housing provision.’*

- 8.14 This was considered the most reasonable threshold for smaller sites in terms of viability across the borough based on the modelling outputs in the AHVA.
- 8.15 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. The Core Strategy will be

updated and amended in line with changes in need and capacity through the Annual Monitoring process.

- 8.16 Please see Section 2 of Factual Statement 1 and Issue 2.11 for further details on the approach to affordable housing and how the Core Strategy aims to meet affordable housing needs.

## 9. Issue 2.9

*Is the policy requiring 50% of affordable housing on every site of 10 or more justified and sufficiently flexible? Is the revised affordable housing threshold justified by evidence base?*

- 9.1 The 50% affordable housing target is considered justified and flexible and the revised affordable housing threshold is justified by the evidence base.
- 9.2 In line with PPS3 the Council are required to set a plan wide target for the amount of affordable housing to be provided. The Council appointed Tribal Consultants to provide a robust assessment of the viability of the proposed affordable housing planning policy and, if appropriate, recommend revised planning policy targets that are viable. The scope of the study was to test viability on types of sites that reflect the range of sites to be included in the Local Development Framework (LDF).
- 9.3 The Affordable Housing Viability Study (October 2010) demonstrates an achievable affordable housing target for the emerging Core Strategy housing policy. The study considered the impact of a variety of targets on viability and sets out evidence for continuing to apply a 50% affordable housing target for sites over 10 units and an affordable housing target for sites under 10 units.
- 9.4 The study was carried out in the four key work stages set out in the report. The framework for analysis involved the identification of representative site archetypes and the policy options; developing the assumptions involved the identification of features, costs and values to apply to each archetype and policy option; financial viability modelling was used to identify which options were viable; finally allowing policy implications and options to be identified.
- 9.5 It was found that a 50% affordable housing policy is viable for sites above ten units, and should be applied. However, a degree of flexibility is required when applying the policy as there may be a need for certain exceptions to be recognised in the case of sites which have a higher existing use or alternative use value. In some cases, the policy is only viable on the assumption that current levels of grant are provided.

- 9.6 The amended threshold of 10 units accords with London Plan policy 3A.11. In response to the additional Regulation 27 Consultation Nov/Dec 2010, the GLA expressed their satisfaction with the revised unit threshold saying it was justified based on the findings of the Council's Affordable Housing Viability Assessment.
- 9.7 Please see the AHVA for further details on the modelling outputs and assumptions.

**10. Issue 2.10**

***How will off site provision of affordable housing be managed? – justified? Consistency between 3.2.21 and 3.2.25?***

- 10.1 Off site provision of affordable housing will only be considered in exceptional circumstances where it may be preferable to on-site provision.
- 10.2 Criteria for, and management of, off site provision are set out in Haringey's Housing SPD.
- 10.3 It is considered that paragraphs 3.2.21 and 3.2.25 are consistent and do not contradict each other.
- 10.4 Paragraph 3.2.21 states the overall approach to maximising and securing affordable housing with a strong preference for on site provision with the aim to ensure mixed tenures and integrated communities, while paragraph 3.2.25 states that Building for Life criteria will be used as design guidance for achieving mixed communities through appropriate tenure mix and high quality design across tenures.
- 10.5 In order to strengthen these paragraphs the Inspector is asked to consider the following further proposed minor changes;

Insert the following wording at the beginning of the second sentence of paragraph 3.2.22:

*'The Council recognises that ...'*

Insert the following wording at the beginning of the first sentence of paragraph 3.2.23, first sentence to read:

*'Only in exceptional circumstances...'*

## 11. Issue 2.11

*Is 'affordable' adequately defined and consistent with PPS3? Targets adequate? Tenure splits justified by evidence base? Adequate detail with regard to the need and intended supply of dwelling house sizes – is this consistent with the evidence base (e.g. Housing SPD and SHMA)?*

### Affordable Housing Definition

11.1 Since publication of the Core Strategy Proposed Submission document May 2010 there have been significant changes to national policy relating to affordable housing, especially PPS3. In light of this it is deemed necessary to amend SP2 and supporting text.

11.2 The Inspector is asked to consider the following proposed minor change: insert following new paragraphs under sub heading 'Affordable Housing' (page 83) to read:

*'In line with PPS3, affordable housing is defined as that provided to eligible households whose needs are not met by the market. Types of affordable housing include social rented, affordable rented and intermediate housing.'*

*'Within this definition of affordable housing the Council require a range of products and an appropriate balance between social and intermediate housing to meet housing needs in the borough. The strategic target for tenure split is 70% social rent (including affordable rent) and 30% intermediate affordable housing products based on evidence of housing need and affordability in the borough.'*

### Housing Need

11.3 To ensure clarity and adequate detail in relation to housing need the Inspector is asked to consider the following further minor changes to the supporting text in SP2:

An additional amendment (highlighted in bold) to the first sentence of proposed minor change as suggested by GLA to additional Reg 27 consultation (as submitted March 2011), in the first paragraph in SP2:

*"The Council will aim to **provide homes to meet Haringey's housing needs and** to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the target of 6,800 homes from 2011/12-2021/22 (680 units per annum) and an additional indicative target of 3,400 from 2020/21-2025/26, until a new housing target is adopted by the Mayor in his replacement London Plan which the Council will meet and exceed thereafter"*

- 11.4 The Inspector is asked to consider the following proposed minor changes:

Insert sub heading after paragraph 3.2.13 to read:

*'Meeting Housing Need'*

Move paragraph 3.2.18 to sit under new proposed sub heading 'Meeting Housing Need' and insert following words at the beginning of first sentence to read:

*'Haringey's Resident Survey 2009 showed that...'*

Insert new paragraph after paragraph above to read:

*'The North London sub-region Strategic Housing Market Assessment (2011) sets out the overall amount of housing required in the borough in the first five years of the Plan, and informs the housing mix, household size, the need for, and level of, specialist housing to be provided to meet the borough's housing need.'*

- 11.5 Replace 3.2.17 to read:

*'Evidence shows that Haringey has a very high overall need for housing (SHMA 2011), within which there is a significant need for affordable housing. To meet the housing needs in Haringey, it will be required that affordable housing provided by developers of market housing will be predominantly social rented housing, in accordance with identified local housing need and affordability'*

This position is in conformity with London Plan and the DRLP.

- 11.6 New paragraph after 3.2.17 to read:

*'The housing market and needs assessment identifies a need for all sizes and tenures of housing, especially affordable one bedroom units, market and social two bedroom units, market and social 3 + bedroom units. This represents a challenge for the borough in that many of those in priority need and in temporary accommodation require larger units. The Council will work closely with Registered Providers and private developers to ensure a suitable and adequate mix of tenures and sizes of dwellings are provided over the plan period in accordance with SP2 and the Housing SPD.'*

- 11.7 Delete paragraph 3.2.19. This information has been updated with SHMA findings.

- 11.8 Replace paragraph 3.2.20 with the following to reflect AHVA recommendations, and DRLP, to read:

*'The Council will apply a 50% target for new affordable housing on sites with the capacity for 10 or more dwelling units. Within that the Council will apply a proportion of 70% social housing and 30% intermediate, based on recommendations from the Affordable Housing Viability Assessment (2010).'*

### **Affordable Housing Targets and Tenure Split**

- 11.9 It is considered affordable housing targets are adequate in terms of meeting housing need and within Haringey's housing capacity. Please see Sections 2 of Factual Statement 1 and Issue 2.9 for further detail.
- 11.10 The AHVA assessed a range of tenure splits and concluded that the tenure mix of a 70:30 proportion of social rented and intermediate housing with grant can be supported on all but the sites in low value areas, however in low value areas the change in tenure mix does not improve viability as viability per se is an issue. The change in tenure mix to 60:40 proportions does however increase residual land value (RLV), so could be of use where grant is not available at the rate to support the policy tenure mix target. In addition, an increase in intermediate tenure housing may be useful in developments where there is already a concentration of social rented housing and a more sustainable housing mix is required.
- 11.11 Overall the study recommended that the 70:30 tenure split is viable but a cascade modification to this to 60:40 should be considered where grant is not available and is required to support development, or where there are wider housing policy reasons for supporting it to achieve an increase in intermediate housing.

### **12. Issue 2.12**

Please see response to Issue 2.7 above.

### **13. Issue 2.13**

***How is the need for students, sheltered and migrant households addressed by the CS?***

- 13.1 The overall approach of SP2 is to provide high quality design, affordable and suitable housing to meet the needs of a growing and diverse population. This includes family housing, housing for single people, different types of sheltered housing needs and housing needs of different ethnic groups.

13.2 The emerging DM DPD contains a policy addressing provision and design of student housing and a policy addressing sheltered housing, hostels and other types of housing for specific needs.

**14. Issue 2.14**

*Is the evidence for gypsy/traveller pitches robust? Is the Council's approach consistent with Annex C of Circular 01/06 and that of the London Plan?*

14.1 The borough has two Gypsy and Traveller sites, both of which are authorised Council sites. The sites have a total caravan capacity of 10 pitches. There are currently no known unauthorised encampments, compared to 10 unauthorised caravans in January 2003.

14.2 The London Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2008 calculated a minimum and maximum requirement for pitches in Haringey to be provided by 2017, this is four and 50 respectively.

14.3 The draft Replacement London Plan and the draft Planning Policy Statement for Traveller Sites state that there is no longer a requirement for local authorities to include targets for additional Gypsy and Traveller pitches in their LDFs, but instead identify need when it arises through other DPDs.

14.4 The draft Planning Policy Statement Planning for Traveller Sites (currently out for consultation) will replace policy in the Circular 01/06 and other policy statements including sections of PPS3 relating to Gypsies and Travellers.

14.5 The draft PPS sets out guidance for local authorities to achieve the Government's objective to ensure fair and equal treatment for travellers. The approach set out in the draft PPS will mean Haringey will be expected to make their own assessment of need; plan for sites over a reasonable timescale; continue to protect Green Belt from development; promote more private traveller site provision; reduce the number of unauthorised developments and encampments while increasing the number of appropriately located and suitable sites which have good access to education, health, employment, welfare and leisure facilities.

14.6 SP3 will ensure that existing pitches are protected and maintained and based on historical demand and the GTANA 2008 the Council will provide an additional four pitches up to 2017. These new potential sites will be identified in the Site Allocations DPD.

14.7 It is considered that SP3 is consistent with the good practice guidance set out in Annex C of Circular 01/06. SP3 uses a positive approach in

ensuring traveller and gypsy accommodation needs are met and existing sites are protected. The policy clearly sets out the necessary criteria for ensuring good quality sites in suitable locations, with access to education, health, employment, welfare and leisure facilities.

- 14.8 In line with Policy 3A.14 London's travellers and gypsies, SP3 ensures protection of existing sites, and the emerging Site Allocations DPD will identify shortfalls in accommodation and identify suitable location for new sites.
- 14.9 The Minor Alteration to the draft replacement London Plan: Draft policy 3.9 Gypsies and Travellers (including travelling show people) (March 2010) states that boroughs are responsible for assessing the needs of, and making provision for local gypsy and traveller communities. Boroughs are expected to do this in line with current policy and by identifying potential sites in emerging DPDs.
- 14.10 To ensure complete consistency with Annex C and the London Plan, and to express the Councils fair and positive approach, it may be appropriate to insert an additional introductory paragraph before SP3, in addition to the proposed minor amendment submitted March 2011. The Inspector is asked to consider the following proposed minor change:

*'One of the key priorities for Haringey is to provide a home for everyone in a safe environment with access to services and facilities. The Council will ensure that the needs of Gypsy and Traveller communities are met in a fair and equal way which respects their traditional and nomadic way of life.'*

*The Council will work with its partners to identify and deliver suitable sites for Gypsies and travellers in the borough, in line with national policy and the London Plan. The Council will aim to promote appropriate and well managed sites to meet the needs of the Gypsy and Traveller communities and, to ensure integration with surrounding communities. New potential sites will be identified in the Site Allocations DPD.'*