

# **Haringey Local Plan – Examination in Public**

## **Representor's Additional Statement**

### **OUR TOTTENHAM NETWORK - PLANNING POLICY WORKING GROUP**

**28.7.2016**

Representor reference ID:

- **Alterations to Strategic Policies Regulation 19 Representations: Representation No. 20: Our Tottenham**
- **Site Allocations Regulation 19 Representations: Representation No. 227: Our Tottenham**
- **Tottenham Area Action Plan Regulation 19 Representations: Representation No. 9**

To the EiP Inspector

Dear Ms Thornby,

Members of the Our Tottenham Planning Policy Working Group wish to draw attention to some new matters in relation to housing issues:

- **Point A** relates to all three documents and representations mentioned above (**Alterations to Strategic Policies, Site Allocations, Tottenham AAP**) as it is about the changing context following recent political change in London and in the UK. The evidence relates to the following **tests of soundness** of the plan: “Justified” and “effective” (new economic and political context has changed the evidence base re. expected trends in the housing market); and “Consistent with national policy” (changing context for the London Plan following the Mayoral Elections, with which all local plans must comply).
- **Point B** relates to Point 12 of the Inspector's Matters and Issues re. **Alterations to Strategic Policies (Policy SP2 HOUSING)**. The evidence relates to the following **tests of soundness** of the plan: “Positively prepared” and “Justified”.
- **Point C** refers to a recent Council Cabinet decision that would impact on any matters and discussions about Estate ‘Renewal’, demolitions and redevelopment. It relates to the **Alterations to Strategic Policies (Policy SP2 HOUSING)** and to the **Tottenham AAP (Policy AAP3 HOUSING)**, and to the following tests of soundness of the plan: “Positively prepared”, “Justified” and “Effective”.
- **Point D** relates to the Inspector’s Note 3 in the ‘issues for examination’ on the **Alterations to Strategic Policies** (as well as the **Site Allocations document**). The evidence relates to the following **tests of soundness** of the plan: “Positively prepared” and “Justified”.

Thanks for giving consideration to this new evidence.

Yours sincerely,

Claire Colomb, Dave Morris, Jacob Secker, Martin Ball

- from the Our Tottenham Planning Policy Working Group

## New matters

### A. The changing context of the London Plan

Since March 4, we have at least five important changes in the political and market environment:

1) a new Mayor of London who has committed himself to modifying the London Plan in favour of a 50% affordable housing target.

2) The London Assembly on 6 July 2016 passed a motion calling on the Mayor to ensure the provision of more social rented housing, the text of which includes:-

*‘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.’*

3) The Housing and Planning Act 2016 will lead to further pressure on family budgets by the ‘pay to stay’ policy, which will increase the demand to exercise the ‘right to buy’ to avoid paying high rents. It also provides for a ‘right to buy’ for housing association tenants which will gradually reduce the social rented housing stock even further. In this environment, now more than ever is it important to increase the social rented stock if the Borough Plan can have any hope of achieving its stated policy DM10 C (‘resisting the loss of all existing housing, including affordable housing.... unless...replaced with at least equivalent new residential floorspace’) and the Haringey Plan’s key objective as expressed in policy 3.2; ‘the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of’.

4) The new Mayor is also committed to giving local residents the opportunity to buy new build housing before it is offered to foreign investors. The mechanism for this is still unclear but the effect or even anticipation of this policy is likely to steer developers in the direction of cheaper dwellings which can be sold quickly and easily to existing Londoners, in order for these developers to avoid cash flow problems and extra borrowing costs.

5) Foreign investors are showing less interest in the London residential property market following the EU referendum and house prices are already reported to be dropping, especially for luxury apartment blocks. This will surely make land cheaper in the medium term, making affordable housing easier to finance than before. However it will also mean the next few years are a bad time for the Council to sell land to raise money, implying considerable risk and uncertainty about whether large-scale estate renewal and densification schemes – implying attracting private investment to secure additional higher-value private housing within the estate envelopes - can realise the target numbers of dwellings.

The first four factors call into question the soundness of a plan based on reducing the earlier 50% affordable housing target to only 40%. The Borough plan needs to be flexible to respond to changes in the London Plan and in the changes in developers’ expectations which are likely to follow. All references to 40% should be replaced by ‘a proportion of genuinely affordable housing as high as possible, with a minimum of 50% as may be set by revisions to the London Plan or policies made by the Mayor and the London Assembly’. Such revision is likely to be supported by additional funding and policy measures from the Mayor, and is extremely important in view of the fact that insufficient genuinely *affordable* housing jeopardises the attainment of the Haringey Plan’s key objective as

expressed in policy 3.2; ‘the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of’.

Regarding factors (4) and (5) above, either may lead to some large developers encountering financial difficulty or pulling out of early-stage development proposals. The implication of the fourth and fifth factors is that the plan, to be sound, surely needs to envisage additional, alternative ways in which targets, especially for affordable housing, can be achieved. These might include methods we stated in our March submission, for example facilitating self-build and community non-profit developments; working with landlords to achieve longer tenancies and to reduce the void rate associated with frequent tenant turnover; extending existing social rented blocks by adding extra wings or floors, or building homes over car parks; buying empty and hard-to-sell homes to let to homeless families; and making it easier for owner-occupiers to obtain planning permission to extend their homes so that existing dwellings can accommodate larger families

An expectation that sale prices of homes are currently dipping, and will rise again in future, also means that it is also very important that the Council should not tolerate long delays between the grant of planning permission and the start of building, nor reduction of s.106 contributions once agreed. This clearly needs to be inserted into the strategic policies.

## **B. Point 12 of the Inspector's Matters and Issues re: Strategic Policies:**

### **(Policy SP2 HOUSING)**

(The question is in relation to paragraph 3.2.9 concerning Housing Estate Renewal, where the third paragraph states that ‘the Council...will seek to re-provide the same amount of social housing on an equivalent floor space basis’. The Inspector asks: Does this mean that in some cases the equivalent may not be able to be provided? [Alt 64])

We would comment that evidence available from the council indicates that less social housing is likely to be provided on the Love Lane Estate than there was previously (this is the only regeneration scheme where we have the hard figures):

- There are 297 properties on the Love Lane Estate (see <http://www.minutes.haringey.gov.uk/documents/s53946/High%20Road%20West%20-%20covering%20report.pdf>, page 4).

- According to Cabinet Minutes from 14/06/2016 there are now 85 leasehold properties on the Love Lane Estate (up from the number of 78 in the above 2014 document: see <http://www.minutes.haringey.gov.uk/documents/g7843/Public%20reports%20pack%2014th-Jun-2016%2018.30%20Cabinet.pdf?T=10>, page 36). All the rest (212) are tenanted properties. Originally they would have been council tenanted properties but with decants due to the demolition temporary residents would have moved into some of them.

- According to the Memorandum of Information for 'partners' for Love Lane only 145 social rented homes will be provided on the site (see [https://tottenham.london/sites/default/files/hrw\\_moi\\_pdf\\_1.pdf](https://tottenham.london/sites/default/files/hrw_moi_pdf_1.pdf)).

- So only just over 2/3rds of social housing is getting re-provided.

- If it is argued that the ‘missing’ social housing will be provided on another site, this begs the question of additionality; that site might in any case have been used to augment the social rented stock even if the first site had never even existed. Re-provision should only be counted on the same estate or if it is obtained by transfer of land and buildings from a use other than social rented housing where that use clearly would not have happened otherwise. Without this proviso that the ‘re-provision’ must be truly additional, the policy is meaningless. A valid example would be where private rented homes are brought into ownership of a social landlord and re-let on social housing terms; or where a developer specifically buys Site B in order to re-provide social rented dwellings which are being demolished or changed to another use on Site A in which his company is also involved; and no other proposals to build social rented homes on Site B had come forward at the time.

### **C. Estate ‘Renewal’ and the Haringey Cabinet drive to abandon any guarantees on tenants’ rights in demolition areas**

#### **Strategic Policies (Policy SP2 HOUSING)**

#### **Tottenham AAP (Policy AAP3 HOUSING)**

Cabinet has just approved a disastrous estate renewal strategy, even worse than the one that was consulted on:

<http://www.minutes.haringey.gov.uk/documents/g7844/Public%20reports%20pack%2012th-Jul-2016%2018.30%20Cabinet.pdf?T=10>

Page 50 on not giving even Council secure tenants a right to return to newly built housing if our estates are demolished:

*‘When the scheme design has been agreed and costed, it may be possible to provide a right of return for example in schemes where it is possible to build sufficient numbers of affordable units of the right size in the same location. However, where the costs of the scheme cannot be met, then additional units for sale may need to be considered, which will reduce the available number of units for rent of the size required by the population on the estate.’*

*6.7 The same consideration will have to be applied to the number of shared ownership or equity units available for leaseholders in the development of the scheme. Although best endeavours will be made to provide a home ownership unit in the same location for existing leaseholders on the estate, it may be the case that this cannot be guaranteed.’*

In relation to re-housed residents on areas re-developed by joint ventures:

*‘If the provider of the replacement homes is the Haringey Development Vehicle (HDV), then the Council will seek to match the tenure and rent level that the tenant currently has, but this is dependent on negotiations with the HDV partner which have not been concluded.’*

Also see page 63:

*‘The Council is committed to enabling communities who wish to do so, to remain together. The Council will endeavour to ensure tenants have the right to return but this may not always be possible*

*and so this is a matter that will be discussed with affected tenants and residents as part of the communications plan on a scheme by scheme basis.'*

and page 64:

*'The Council agrees that the package of measures offered to tenants and leaseholders in the estate renewal scheme at High Road West is relatively generous. This is a small scheme affecting around 200 tenants. However, forthcoming schemes are likely to be much larger, and It would be difficult to provide such a package of measures again as it would be likely to make estate renewal schemes less viable financially. It is not proposed to offer exactly the same package in all future estate renewal schemes. There are key elements of the proposed arrangements which will be a matter of a decision on a scheme by scheme basis; these issues will themselves be subject to consultation on a scheme by scheme basis, when the design and costs of the individual scheme are known.'*

Page 65: Comparing the target rent guarantee for High Road West residents with the guarantees for people re-housed in subsequent schemes:

*'[High Road West] Rent guarantee – The Charter says ‘you will continue to pay a social rent’ [Other schemes] The proposed policy does not offer a rent guarantee, but says that the Council is committed to keeping rents affordable.'*

On a slightly different but very related note you might want to see the kind of rent levels the council thinks are ‘affordable’ for the small number of new council homes they are building (same web reference as above page 171):

<i>Bedrooms</i>	<i>Target rent</i>	<i>Revised Rent</i>	<i>(Draft Housing Strategy)</i>
<i>1</i>	<i>£88.29</i>	<i>£213.50</i>	
<i>2</i>	<i>£104.75</i>	<i>£228.00 – £302.33</i>	
<i>3</i>	<i>£120.06</i>	<i>£206.25 – £302.46</i>	
<i>4</i>	<i>£136.41</i>	<i>£311.54</i>	
<i>5</i>	<i>£157.82</i>	<i>£342.69</i>	

Refusing to offer right of return and offering no target rent guarantee is totally unacceptable. In addition families in Haringey cannot afford £300 a week for council homes.

This policy has been approved by Cabinet but the Full Council has not done yet and does not meet again until November. It is also worth noting that the huge rents proposed above are totally against Sadiq Khan's pledge that social housing rents will be no more than one third of average household take-home pay for the area. Most households in Haringey are not taking home £900 a week.

## **D. Inspector's Note 3 in the 'issues for examination' on Alterations to Strategic Policies**

**(also Site Allocations document)**

We are concerned that where developers offer to build more than the estimated site capacity mentioned in the DPD, this may sometimes be through undesirably high densities, leading to loss of green space within sites, or buildings which are too high to have regard for the amenity of surrounding areas. An example of this is SA60, where 70 dwellings are envisaged in the DPD but the developers are now proposing 134. This involves blocks up to 5 storeys, which residents argue are out of keeping with the surrounding 2-3 storey terraced homes. They also fear that such high buildings will adversely affect the park next to the site. We think that the number of dwellings on each of the DPD sites, where such a development is acceptable, should not exceed say 10% more than the number stated in the DPD unless three conditions are met; (1) that a greater number facilitates an increase in the total stock of genuinely affordable rented dwellings (2) that local residents support this number (3) that all other development management policies can be met with the larger number.