

<b>Report for:</b>	<b>Cabinet 17 March 2015</b>	<b>Item Number:</b>	
<b>Title:</b>	<b>Consultation on Haringey's draft Housing Strategy 2015-2020</b>		
<b>Report Authorised by:</b>	<b>Lyn Garner, Director of Regeneration, Planning and Development</b>		
<b>Lead Officer:</b>	<b>Dan Hawthorn, Assistant Director for Regeneration</b>		
<b>Ward(s) affected: All</b>		<b>Report for Key/Non Key Decisions:</b>	
		<b>Key decision</b>	

## **1. Describe the issue under consideration**

- 1.1 This report seeks Cabinet approval to begin a six week period of public consultation on the draft Haringey Housing Strategy 2015 - 2020. The consultation period will give the council's residents, partners and stakeholders the opportunity to inform the development of the final Strategy for Cabinet to recommend adoption by Full Council later in 2015.

## **2. Cabinet Member introduction**

- 2.1 As a Labour Council we recognise that housing is fundamentally about people and communities, not just bricks and mortar. Having access to a good quality home at a price you can afford is key to being able to lead a healthy, economically active and happy life. Poor quality housing damages health, reduces children's school attainment and strains relationships. In thinking about housing and setting out our new strategy, we want to take an holistic, wrap around view of housing - recognising the central importance of housing to our communities in Haringey.
- 2.2 We will not stand by and watch the housing crisis unfold. We will take clear and bold steps to stand up for our residents.



- 2.3 This strategy sets out priorities to create a step change in the number of homes, to improve the quality of all homes, to do more to support those facing housing crisis and ensure that our communities receive clear social dividend from our housing approach.
- 2.4 It also sets out our intention to innovate and intervene where the market is not serving our residents. We set out plans for a new wave of shared ownership homes to help people onto the housing ladder, plans for a new non profit lettings agency to give private renters a better deal and plans to improve our social housing stock including major estates.
- 2.5 This is a strategy not for the council but for the borough - to set direction on housing for all of those involved in building or managing homes.
- 2.6 Housing is one of the most important and challenging issues facing our communities. It's important that the priorities and plans we set out are the right ones - I hope residents, community groups, housing associations, developers and investors will engage with this consultation so that together we can have the strongest possible plan for tackling the housing crisis and building better life chances for our residents.

### **3. Recommendations**

- 3.1 It is recommended that Cabinet:
  - a) Notes the report on the first round of consultation (Appendix B) and the Equalities Impact Assessment (Appendix C);
  - b) Notes the issues raised by the Regulatory Committee at its meeting of 3 March 2015 and the officer response at Section 8;
  - c) Endorses the draft Housing Strategy document as a statement of the council's housing priorities for the period 2015 - 2020 for public consultation; and
  - d) Notes the proposed process for consultation and adoption of the final Strategy at paragraph 6.11.

### **4. Alternative options considered**

- 4.1 The council's existing Housing Strategy was written in 2008/09 and covers the 10-year period 2009 to 2019. Consequently the council could consider taking no action and not renew the housing strategy. However, since it was published there have been many changes that have led us to believe that it is no longer fit for purpose.
- 4.2 The council could also consider carrying out a simple review and refresh of the 2009 – 2019 strategy. However, the extent of the changes since 2009 are such that this would not enable the council to adequately meet the challenges it faces.



- 4.3 Alternatively, the council could rescind the housing strategy altogether and move forward without one – there is no statutory requirement on a local authority to produce a housing strategy – however, having a strategy is considered both best practice and necessary to articulate how the council will meet the housing challenges and deliver its housing objectives and priorities.

## **5. Background information**

- 5.1 The Council's Corporate Plan for 2015-18 sets out the council's overall priorities and programme of work for the period for 2015-18. It identifies housing as one of its five priorities, committing us over that period to '*Create homes and communities where people choose to live and are able to thrive*'. Housing also plays a role in delivering across the other priorities in the Corporate Plan, for example through the role that new homes will play in driving the priority for growth and regeneration, or the importance of housing in making sure that children and adults lead the most fulfilling lives that they can.
- 5.2 The Corporate Plan goes on to define specific objectives under each of its five priorities. The role of the Housing Strategy is to flesh out in particular the objectives under Priority 5: to say more clearly what success looks like, to say what the council will do itself and what it expects others to do; and to demonstrate clearly how housing can play a role in meeting our objectives right across every element of the Corporate Plan. In that way, this Strategy is a more detailed development of the high level objectives set out in the Plan.
- 5.3 Whilst having a housing strategy is not a statutory requirement, having one is considered both best practice and necessary to set out how the council will tackle the many housing challenges that are facing the borough's residents.
- 5.4 Since the last Housing Strategy for Haringey was published in 2009, there have been significant changes at a local, regional and national level. These include:
- a) Changes in government policy on local government, housing and welfare with Haringey facing a greater challenge than ever in meeting the housing needs of its residents but with less money and fewer staff
  - b) A significant reduction in public subsidy for affordable housing with the introduction of affordable rents at up to 80% of local market rents
  - c) A growing population; Haringey's population has grown from 216,510 in 2001 to a projected 293,749 by 2026 with particular growth in working age and older residents
  - d) The Mayor of London – through his Further Alterations to the London Plan (FALP) – has set Haringey an increased target of building 1,502 new homes in the borough per year for the period between 2015/16 and 2025/26
  - e) A growing gap between incomes and housing costs in Haringey



- f) A growing private rented sector with increasing concern about its quality, management and affordability

## **6. The draft strategy**

6.1 The council faces significant challenges in simply making sure enough homes are built to meet demand, and that all homes are well designed, fit to live in and affordable. However, housing is also about enhancing the lives of the people who live in those homes, providing support and assistance to those who do not have a place to live and ensuring that the right infrastructure is in place to support local communities, growth and jobs.

6.2 Having a housing strategy will enable the council, and its partners, to achieve this by identifying key priorities, actions and interventions that are needed. Haringey's housing strategy:

- Sets out a robust analysis of the housing needs and aspirations of all members of its local communities
- Analyses the demographic projections and the likely implications in terms of health, social care, community safety and other needs
- Provides an understanding and awareness of the nature and condition of all housing stock in the area and how it addresses or falls short of meeting the needs and aspirations of local people, and links to better health, wellbeing etc
- Will help the council plan, with businesses, local communities etc, how to address the gaps and shortfalls

6.3 Haringey's new strategy describes how the council, together with its partners, will rise to these challenges. It proposes a clear and simple vision for housing in Haringey:

*Housing is about people and communities, not just bricks and mortar. This means mixed and inclusive neighbourhoods where residents can lead happy and fulfilling lives.*

6.4 It then summarises the proposed approach with four simple objectives:

- i. Improve help for those in housing crisis
- ii. Ensure that housing delivers a clear social dividend
- iii. Drive up the quality of housing for all residents
- iv. Achieve a step change in the number of new homes being built



- 6.5 Under these objectives, the draft Housing Strategy (Appendix A) sets out how the council and our partners (the organisations we work with) can best use increasingly scarce resources over the next five years to bring about maximum benefit to the borough's residents. It highlights some of the key policy decisions, initiatives and investments which the council is already pursuing, as well as those areas which need further work, including through the policies and sub-strategies that will together set out Haringey's detailed approach to housing.
- 6.6 The council commissioned a Strategic Housing Market Assessment (SHMA) in 2013/14 to help it understand the extent of the need for housing in the borough and how the local housing market operates. Through a desktop review and a resident household survey, the SHMA looked at the current housing stock, as well as demographic, economic and housing trends. It highlighted a number of issues and made recommendations:
- a) **A clear affordability gap for many Haringey residents:** the supply of affordable housing should be increased; those on lower incomes should be helped to access home ownership; enable access to London's better paying jobs as well as local economic development.
  - b) **A continued need to maintain housing supply of all tenures to address demand:** the council should encourage all sources of delivery of new homes including building its own new homes. There should be a balance of affordable and market homes to meet demand across the borough whilst recognising the significant east/west difference in land values; the council should continue its estate regeneration and intensification ambitions, particularly in Tottenham and Northumberland Park to achieve a mix of housing sizes, types and tenures.
  - c) **Over the long term, delivery of new homes for sale, including low cost home ownership, should focus on the east of the borough**
  - d) **The private rented sector had a key role:** the current PRS stock should be fit for purpose and there was much scope for increasing the PRS particularly in the east of the borough
- 6.7 Given the importance of the Housing Strategy, and its relationship to planning policy, the council is conducting two separate consultation exercises to get input from residents, partners and stakeholders to help shape the content of the document. The first exercise was carried out between 20 October and 12 December 2014 and sought opinion on the draft vision, priorities and principles that could be included in a new Housing Strategy. A large majority of stakeholders expressed support for the proposals.
- 6.8 The council received a large number of comments from respondents highlighting a wide range of issues and concerns. The most important of these were:
- Affordability of homes in the borough
  - Scepticism that the Council will deliver its housing ambitions



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- More homes should be built in the borough
- Quality and management in the private rented sector
- Homes should be set in a good quality environments (internal and external)

- 6.9 A consultation report including a list of stakeholders consulted and feedback from respondents is contained in Appendix B.
- 6.10 The results from this consultation exercise were used to inform the development of the draft Housing Strategy presented to the Regulatory Committee at its meeting on 3 March 2015. The comments of the Regulatory Committee are set out in section 8 below.
- 6.11 If Cabinet approves the draft document, the council will begin a second, six week period of consultation on the draft strategy. Due to the General Election and Purdah period, consultation on the draft strategy will not begin until mid-May 2015 and will run for six weeks until the end of June 2015. A consultation report will be prepared and presented to Cabinet alongside the final version of the Housing Strategy in July 2015.

## 7 Links between the draft housing strategy and planning policy

- 7.1 The evidence base used to support the development of the Housing Strategy will also inform planning policy in relation to housing activity in the borough. For this reason, the draft Housing Strategy is designed to provide guidance for developers and landowners in respect of how they should approach new developments in the borough.
- 7.2 The key planning related issues that the housing strategy considers are contained in Objective 4 '*Achieve a step change in the number of new homes being built*'. These include:
- a) **Maximising the number of new homes:** Commits us to meeting the Mayor of London's target of building 1,502 new homes every year between 2015/16 and 2025/26 as our contribution to meeting London's overall needs, and acknowledges that we have allocated sufficient sites, through our draft Local Plan, with capacity to meet the London Plan target.
  - b) **Promoting affordable housing:** Establishes that we need to provide 40% on-site affordable housing on schemes of ten units or more, with that affordable housing split between 60% affordable social rent and 40% intermediate. The Cabinet endorsed the 40% figure at its meeting on 20<sup>th</sup> January 2015 notwithstanding the earlier recommendation of the Regulatory Committee on 15<sup>th</sup> January 2015. The strategy also recognises that in Tottenham, where the level of social stock is already high, we will take a different approach, promoting affordable home ownership by requiring an affordable housing mix of 60% intermediate and 40% affordable rent.



- c) **Supporting the development of strong mixed communities:** Recognises that in order to achieve this, and improve the overall balance across Haringey, the council will prioritise the delivery of new affordable rented homes in the centre and west of the borough while promoting more market and intermediate homes, including for affordable home ownership and private renting, in Tottenham.

Evidence from the housing register and Strategic Housing Market Assessment (SHMA)(May 2014) shows that the greatest need across all sectors of the housing market is for two and three bedroom properties.

The draft Housing Strategy establishes that new affordable housing for rent throughout the borough should be provided to meet local housing need. An appendix to the draft Housing Strategy sets out the borough wide targets for bedroom size mixes for affordable and intermediate homes. The mixes will be updated as necessary to reflect new or emerging evidence. For affordable rented homes, the bedroom mix the council expects is:

- 15% one bedroom units;
- 43% two bedroom units;
- 32% three bedroom units;
- 10% four (or more) bedroom units.

We generally expect homes for affordable home ownership, market sale and private rent to focus primarily on delivering smaller – one and two bedroom – units. Based on the findings in the Strategic Housing Market Assessment (SHMA)(May 2014), the council expects a (borough wide) bedroom size mix for new private housing (including low cost home ownership) which provides:

- 20% one bedroom units;
- 50% two bedroom units;
- 25% three bedroom units;
- 5% four (or more) bedroom units.

Tenure and bedroom size mix on individual sites may differ according to local characteristics and localised housing demand. For example, in some areas we may require a different mix, with more larger or smaller homes, to correct local imbalances and meet particular local needs.

- d) **Housing estate renewal:** establishes that estate renewal schemes will not be subject to normal planning policy guidelines in relation to affordable housing provision. The strategy commits us to re-provide the number of habitable rooms in council homes lost through demolition, with an emphasis on providing family accommodation, recognising that this will sometimes mean a reduction in the overall number of social rented homes on some estates.





## **8 Comments of the Regulatory Committee**

- 8.1 The Regulatory Committee considered the draft Housing Strategy, consultation report and Equalities Impact Assessment at its meeting on 3 March 2015. The Committee raised a number of issues which are set out below together with information on how these have been dealt with:

<b>Issue raised</b>	<b>How issue dealt with</b>
The Committee noted a significant reduction, across neighbouring boroughs, in the numbers affordable homes being built given the large reduction in government subsidy.	Officers agreed to circulate the figures of the number of affordable homes being built in Haringey and neighbouring boroughs to the Committee.  No changes have been made to the Cabinet report or the draft Housing Strategy.
The Committee asked for further details on the approach being adopted in the strategy.	The Chair clarified that in its current format the document had a number of over-arching strategy points and that some of the detail was still to be developed. Officers confirmed that they were seeking the Committee's recommendations on the over-arching strategy.
The Committee expressed an interest in understanding the delivery model in more detail when this was better understood.	Officers responded that the various delivery plans and sub-strategies would be developed over a period of time and that some of these in fact already exist, such as the Housing Investment and Estate Renewal Strategy. Officers agreed to send round an outline of the various sub-strategies that exist to the Committee. It was agreed that the report should more clearly outline the fact that there are a number of sub strategies and delivery plans sitting beneath the over-arching Housing Strategy.  In the draft Housing Strategy, a table of housing-related sub-strategies that will assist in delivering the council's Housing Strategy has been inserted at the end of Section 3.6 How will the





Issue raised	How issue dealt with
	<p>strategy be delivered? The table also includes information on when different sub-strategies will be completed or the date they were completed if they are already in place.</p>
<p>The Committee raised concerns with the commitment on p.34 to increase the PRS stock, particularly in the east of the borough.</p>	<p>Cllr Strickland (Cabinet Member for Housing and Regeneration) responded that this is linked to raising quality standards. It was noted that there is firm demand for private sector housing in the area and the council is keen to insert purpose built good quality private rented sector accommodation into that market.</p> <p>The draft Housing Strategy has been updated. The paragraph starting “For the longer term ...” under Chapter 7, Objective 3 now reads:</p> <p>“For the longer term, we also want to increase the amount of purpose-built, professionally-managed and affordable private rented housing in the borough, which will not only improve the overall range, mix and quantity of homes but will also help to set new standards in the quality and management of private rented housing. We set out in Objective 4 that this new type of private rented housing will be focused in the east of the borough where they will form part of the Housing Zone proposals and wider regeneration plans in Tottenham. These activities will bring forward housing growth for the borough including good quality affordable private rented homes offering enhanced tenancy conditions such as longer tenancy terms than is normal in the private rented sector. We are also embedding quality requirements in our development plan policy, with a commitment to reducing unsuitable conversions of small homes</p>



Issue raised	How issue dealt with
	through family housing protection areas.”
<p>The Committee also raised concerns with the commitment on p.35, that the Council needed to provide 40% on-site affordable housing but neglected to mention targets for sites of less than 10 units.</p>	<p>Cllr Strickland responded that this was more a matter for Planning policy as opposed to a Housing Strategy.</p> <p>Subsequent to the Regulatory Committee meeting additional clarification is that the application of a 20% affordable housing requirement on sites of nine units or fewer is not included in the draft Housing Strategy because this is currently subject to consultation on changes to Haringey’s Local Plan which is happening in response to national changes in planning policy. National planning policy excludes seeking contributions for affordable housing for sites of ten units or fewer.</p>
<p>The Committee noted there was no definition of what is an affordable or what a social rent is and the terms seem to be used interchangeably.</p>	<p>Cllr Strickland responded that there would be a mix of rents across the borough and that the provision to charge 80% of market rent for social housing was designed to cross subsidise the funding for new homes.</p> <p>An amendment has been made to the draft Housing Strategy. A footnote has been added to the relevant bullet point under Objective 4 in section 2.5 of the draft Housing Strategy providing a definition of affordable and social rents which reads as follows:</p> <p>“Affordable rented homes means social rented and “Affordable Rent” homes. Social rented homes are let by the council and housing associations on rents which are on average 30% of local market rents and usually let on tenancies which last indefinitely. The government introduced a new form of affordable home in 2012 which are</p>



Issue raised	How issue dealt with
	<p>homes let on an Affordable Rent. The rents of Affordable Rent homes can be up to 80% of local market rents and are usually let on fixed term tenancies. Affordable Rent homes in Haringey have so far been produced by housing associations and the average rents for them have been around 65% of local market rents.”</p>
<p>The Committee raised concerns with the policy of calculating the number of units replaced in terms of habitable rooms. The Committee requested that the report advocated replacing units like for like when estates were regenerated.</p>	<p>Cllr Strickland responded that this commitment was given for the Love Lane estate, where there was sufficient space to redevelop this site on a like for like basis. However, it was noted that on some other estates affordable housing would be re-provided by habitable rooms, as a significant proportion of properties on say, the Northumberland Park estate, are overcrowded and it may be more effective to build fewer properties with more rooms. In areas where social housing was very dense, this would be more difficult.</p> <p>The draft Housing Strategy has been amended. An additional paragraph has been inserted after the second bullet point in Section 8.4 Housing estate renewal. This new paragraph says:</p> <p>“Haringey’s policy - on replacement of existing council housing on regeneration estates being on a habitable rooms rather than lost units basis - is to enable the borough to maximise opportunities to meet evidenced affordable housing need. Affordable housing need in the borough is for fewer smaller homes and more larger homes than is currently provided within the current council housing stock. The number of current habitable rooms will be the</p>



Issue raised	How issue dealt with
	minimum replaced and the council will always try to increase the number built subject to viability.”
The Committee supported the report’s assessment that design plays a central role in driving up house quality and requested that this is highlighted further in the report.	The Cabinet report has been updated at paragraph 6.1 to read “The council faces significant challenges in simply making sure enough homes are built to meet demand, and that all homes are well designed, fit to live in and affordable.”
The Committee expressed concern with residents who benefitted from social housing but also owned property abroad and requested that the report explicitly note that people who live abroad are not entitled to social housing.	<p>Section 5.3 of the draft Housing Strategy has been amended.</p> <p>The title for this section has been changed to “Allocating affordable housing” from “Allocating social housing” and two sub-sections introduced: one headed “Social and affordable rented homes” and the other headed “Low cost home ownership homes”.</p> <p>In the new sub-section on Social and affordable rented homes, it has been clarified that these homes go only to applicants on Haringey’s Housing Register with the highest level of housing need and/or an urgent need to move.</p> <p>In the new sub-section on low cost home ownership homes, the council sets out its intention to consult on a new Shared Ownership Policy to prioritise low cost home ownership homes in Haringey for people who live and work in the borough.</p>
The Committee clarified that it was concerned with Council accommodation being replaced like for like, as opposed to Council housing being replaced by a range of other social housing provision e.g. through	Cllr Strickland responded that the December Cabinet report on the Love Lane Estate expressed a strong preference for rebuilding Council accommodation with Council accommodation, but that this was



Issue raised	How issue dealt with
housing associations.	ultimately subject to financial considerations. Cllr Strickland noted that the Council was trying to be quite creative in terms of bringing in the money and also having the Council directly involved in the housing stock long term.
The Committee asked for clarification on how Right to Buy schemes would have an impact on the proposed new homes.	Cllr Strickland replied that the first batch of new homes were not protected from coming under the Right to Buy scheme but new build homes benefitted from a 'floor price' that protected the amount of money put in for a certain number of years. In addition, stock built by the ALMO can be protected from Right to Buy.
<p>The Committee questioned how a reduction in the number of estates managed by more than one housing association would be achieved.</p> <p>The Committee requested that the document elaborated on how the Council will encourage stock rationalisation between Registered Providers.</p>	<p>Cllr Strickland responded that negotiations had been undertaken with the 6 major housing associations who agreed to work together to tackle this issue.</p> <p>In addition, the draft Housing Strategy has been amended to explain this.</p> <p>A sentence has been added to the second paragraph of section 7.2 "Improving the quality and management of homes owned by registered providers". The sentence reads "This will be achieved through the council's preferred partnership agreement with the borough's registered providers, a key objective of which is to establish a partnership approach to the provision, management and maintenance of affordable housing to raise standards across the borough".</p>
The Committee questioned the use of the terminology of 'black and white' in the equalities section of the report and noted that a reference to numbers of	<p>Officers agreed to make changes to this section of the report.</p> <p>The draft Housing Strategy has been</p>



Issue raised	How issue dealt with
BMEs might be more helpful.	<p>amended at section 3.5 Equalities Impact Assessment. “black” has been changed to “Black and ethnic minority” but the wording “white” remains as there is no alternative wording.</p> <p>The Equalities Impact Assessment accompanying the draft Housing Strategy has been updated to show which ethnic groups are included under the broad ethnic categories of “Black”, “Asian”, “Mixed”, “White” and “Other”.</p>
<p>The Committee raised concerns around the fact that the Housing Strategy stated that, for schemes of 10 units or more, the requirement for affordable housing will be 40%, when the decision to reduce the threshold from 50% to 40% was still subject to consultation.</p>	<p>The Assistant Director confirmed that the 40% threshold was laid out in the Planning Policy document which was subject to consultation and noted that there was an alignment issue as a consequence of the timing of the publication of the two reports. It was agreed that the draft Housing Strategy should note that this provision was “subject to consultation”.</p> <p>The draft Housing Strategy has been amended to include a footnote to the second paragraph in Section 8.1 which reads:</p> <p>“Note that the 40% threshold quoted here is set out in planning policy documents which are, as at March 2015, subject to consultation. Until formally agreed, the threshold for affordable housing remains at 50%. Consultation is currently taking place and is due to finish on 27 March 2015.”</p>
<p>The Committee also noted that the consultation document may want to outline more clearly that estate renewal may not necessarily result in properties being Council-run accommodation.</p>	<p>Cllr Strickland agreed to review this section with Officers and see if changes needed to be made.</p> <p>The draft Housing Strategy will be amended to reflect this after the consultation.</p>



Issue raised	How issue dealt with
<p>The Committee asked for further clarification on how estate renewal would tackle issues of overcrowding particularly when reallocating on a habitable rooms basis.</p>	<p>Officers confirmed that a holistic approach would need to be taken and that overall this would require not just analysing the number of rooms on an individual estate but also looking at the Housing Infill Programme and creating additional capacity on estates that can generate more units. Officers noted that the number of habitable rooms offered should be looked at in terms of a minimum baseline guarantee.</p>
<p>The Committee asked whether the building of new accommodation based on a shared public/private sector funding would necessitate higher rents to cover the cost of the development.</p>	<p>Officers responded that there is a possibility that some properties could be offered at higher rents in order to cross subsidize the scheme but, by building at scale and by adopting innovative funding models it should certainly be possible to keep rents at current levels.</p>
<p>The Committee raised concerns that the approach of allowing rents on smaller units to be set at up to 80% while limiting rents on larger properties at 45% will act as a disincentive to developers to deliver enough larger units and encourage them to focus on delivering smaller units.</p>	<p>The Assistant Director of Planning commented that this is covered by a planning policy position and the London Plan, as well as the Housing Strategy statement around developing an affordable mix and bedroom sizes. It was also noted that one of the benefits of adopting a habitable rooms as a basis for re-provision is that it reduced the incentive to the developer on how the overall quantum of development is divided.</p>

## **9 Comments of the Chief Finance Officer and financial implications**

- 9.1 The costs of producing this strategy document and the related consultation process can be contained within existing budgets.
- 9.2 The Strategy in itself does not make any recommendations to change policy and hence has no direct financial implications, however, where the strategy leads to policy decisions at a later date, then the Financial Implications and budget requirements of those decisions will be included within the relevant Cabinet reports. Existing revenue budgets already exist to prevent homelessness and





capital budgets are identified to improve the quality of housing and funding related to these areas are included in the budget proposals presented to Cabinet and Full Council in February 2015.

- 9.3 Due to changes in the funding arrangements for Local Government, the Council is becoming increasingly dependent on Council Tax and Business Rates as a source of funding, and thus Housing growth is necessary to ensure the Council's funding position does not worsen.

## **10 Comments of the Assistant Director of Corporate Governance and legal implications**

- 10.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.
- 10.2 Under section 41 of the Greater London Authority Act 1999, as amended, ("GLAA99"), it is a general duty of the Mayor of London to prepare and publish a London housing strategy. Under section 333D of GLAA99, any local housing strategy prepared by a local housing authority in Greater London must be in general conformity with the Mayor of London's London housing strategy,
- 10.3 Under section 8 of the Housing Act 1985, local housing authorities (including Haringey Council) shall consider and review on a periodical basis the housing conditions in their area and the housing needs of the area with respect to the provision of further housing accommodation. Section 3 of the Housing Act 2004 further imposes a duty on local housing authorities to keep housing conditions in their area under review.
- 10.4 Under section 87 of the Local Government Act 2003 (as amended), the Secretary of State for Communities and Local Government has the power to require local housing authorities to have a housing strategy and impose requirements with respect to the ends that the strategy is to be designed to achieve, the formulation of policy for the purposes of the strategy or review of the strategy. The Secretary of State also has the power to order local housing authorities to prepare statement setting out their housing strategy and other material relating to housing. To date, the Secretary of State has not formally exercised these powers. The Explanatory Notes to this Act however describe a local housing authority's Housing Strategy as:
- "... the local housing authority's vision for housing in its area. It sets out objectives and targets and policies on how the authority intends to manage and deliver its strategic housing role and provides an overarching framework against which the authority considers and formulates other policies on more specific housing issues."*
- 10.5 The Secretary of State in the 2007 Green Paper "Homes for the future: more affordable, more sustainable" developed the reference to the local housing authority's strategic role as follows:



*“The local authority strategic housing role is made up of the strategic decisions and activities associated with effective planning and delivery, in order to meet the housing needs of all residents across all tenures. Strong performance in this role will support effective place shaping and help ensure delivery of the wider sustainable community. This requires vision, leadership, planning and delivery at a strategic level to:*

- *assess and plan for the current and future housing needs of the local population across all tenures;*
- *make the best use of the existing housing stock;*
- *plan and facilitate new supply;*
- *plan and commission housing support services which link homes to the support and other services that people need to live in them;*
- *work in partnership to secure effective housing and neighbourhood management on an ongoing basis”*

10.6 Section 225 of the Housing Act 2004 states that “housing” (for the purposes of carrying out the housing needs review required by section 8 of the Housing Act 1985 and for the purposes of preparing a housing strategy under section 87 of the Local Government Act 2003) includes the accommodation needs of gypsies and travellers residing in their area.

10.7 The Public Sector Equalities Duty (“PSED”) set out in section 149 of the Equalities Act 2010 obliges the Council in performing its functions “to have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it”

10.8 The Housing Strategy document itself is not a formal Planning document and consequently will not form part of the statutory Development Plan. While it will be a material consideration, it will not carry significant weight in the development management process.

10.9 The Supreme Court has recently endorsed the following general principles of consultation:

- That consultation must be at a time when proposals are still at a formative stage;
- That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
- That adequate time must be given for consideration and response; and



- That the product of consultation must be conscientiously taken into account in finalising any statutory proposals.

10.10 In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

## **11 Equalities and Community Cohesion Comments**

11.1 A detailed Equalities Impact Assessment of the draft Housing Strategy was undertaken which is set out in Appendix D. Recommendations arising from the assessment are shown in the table below.

<b>Objective</b>	<b>Recommendations</b>
Objective 1, Improve help for those in housing crisis	<ul style="list-style-type: none"> <li>• Introduce regular monitoring and analysis of lettings of social rented homes in terms of protected characteristics</li> <li>• The housing circumstances and needs of households aged 18-24 and 25-44 which are the biggest age groups accepted as homeless, in TA and on the Housing Register need to be understood and an appropriate response put in place.</li> <li>• Examine the housing circumstances of Black and White female headed households on the Housing Register and in temporary accommodation with a view to addressing their particular housing needs</li> </ul>
Objective 2, Ensure that housing delivers a clear social dividend	<ul style="list-style-type: none"> <li>• Put in place equalities monitoring for all projects and activities which deliver new homes and jobs to ensure that all Haringey residents benefit proportionately</li> <li>• Where monitoring shows that residents with particular protected characteristics are not benefiting the reasons should be assessed and mitigating action put in place</li> </ul>
Objective 3, Drive up the quality of housing for all residents	<ul style="list-style-type: none"> <li>• Introduce regular monitoring of new developments to ensure they meet the needs of local people</li> </ul>



Objective 4, Achieve a step change in the number of new homes being built	<ul style="list-style-type: none"> <li>Explore ways of ensuring Black households in Haringey have access to, and can benefit from, this objective, particularly the focus on low cost home ownership in the east of the borough.</li> </ul>
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- 11.2 During a second round of consultation on the draft Housing Strategy, the issues highlighted in the initial Equalities Impact Assessment will be explored further. A final Equalities Impact Assessment will reflect the findings of the consultation and will be incorporated into the final version of the strategy and report to Cabinet.

## **12 Head of Procurement Comments**

- 12.1 After consultation and following the release of the Final Strategy, the Corporate Procurement Unit will engage with commissioners, providers and suppliers to ensure apprenticeships and vocational training opportunities will come from the Housing Strategy, its investment in new building works, estate renewals and Decent Homes improvements.
- 12.3 The Corporate Procurement Unit will use contracting processes to help residents benefit from employment opportunities by designing Council contracts to address the desired outcomes and achieve social value objectives that the Council wants from the Housing Strategy.

## **13 Policy Implication**

- 13.1 The draft housing strategy is a document for public consultation. Once adopted by Full Council the housing strategy will inform all housing service provision by the council, and Homes for Haringey, for the period 2015 to 2020. All future housing policies during this period will adhere to the vision, objectives and principles set out in the strategy. It will also inform the provision of housing, and housing related services by the council's partners and the development of new housing in the borough. Future policies and work streams include among others, a new Homelessness Strategy, a Private Sector Housing Strategy, a refreshed Affordable Warmth Strategy and the council's Housing Transformation Programme.

## **14 Reasons for Decision**

- 14.1 Producing a housing strategy is considered best practice. It summarises the key housing challenges facing the borough and sets out how both the council and its partners can work together to tackle them.
- 14.2 The strategy will help the council, in partnership with others, to make sure that:



- Our existing housing is in a good, safe condition;
- New housing meets the needs of our community and is built to good quality standards;
- We target limited resources to those who need them the most; and
- Our partners know what is expected of them when providing housing and housing related services.

14.3 The council is proposing a revised housing strategy for the period 2015 to 2020, as its current housing strategy is considered out of date. Since the current Housing Strategy was published in 2009, there have been significant changes at a local, regional and national level. These include:

- a) Changes in government policy on local government, housing and welfare with Haringey facing a greater challenge than ever in meeting the housing needs of its residents but with less money and fewer staff
- b) A significant reduction in public subsidy for affordable housing with the introduction of affordable rents at up to 80% of local market rents
- c) A growing population; Haringey's population has grown from 216,510 in 2001 to a projected 293,749 by 2026 with particular growth in working age and older residents
- d) Further Alterations to the London Plan (FALP) – has set Haringey an increased target of building 1,502 new homes in the borough per year for the period between 2015/16 and 2025/26
- e) A growing gap between incomes and housing costs in Haringey
- f) A growing private rented sector with increasing concern about its quality, management and affordability

## **15 Use of Appendices**

**Appendix A:** Draft Housing Strategy 2015 - 2020

**Appendix B:** Full report on responses from the consultation on the vision, objectives and principles carried out between October and December 2014

**Appendix C:** Equalities Impact Assessment of the draft Housing Strategy 2015 - 2020

## **16 Local Government (Access to Information) Act 1985**

Background documents for this report are set out below:

National Planning Policy Framework  
Mayor of London, London Plan 2011  
GLA Further Alterations to the London Plan 2014



**Haringey Council**

Mayor of London, London Housing Strategy, 2014  
Haringey Council Corporate Plan 2015– 2018  
Haringey Council Strategic Housing Market Assessment 2014  
Haringey Council Local Plan 2013  
Haringey Council Tottenham Strategic Regeneration Framework  
Haringey Council Wood Green Investment Framework  
Haringey Council Housing Investment and Estate Renewal Strategy 2013  
Haringey Council Local Plan Making - Review of Haringey's Local Plan: Strategic Policies, "Preferred Options" for Tottenham Area Action Plan, "Preferred Options" for Site Allocations Development Plan Document, and "Preferred Options" for Development Management Development Plan Document, and the Local Development Scheme