

## Appendix 2: Housing and Regeneration Scrutiny Panel Social Housing Scrutiny Report – Responses to Recommendations

**Overall comments on the report**

This report provides a useful set of detailed recommendations to help guide the development of the policy agenda in housing, regeneration and planning for the new administration. While it does not set out a detailed list of explicit objectives to be delivered to a given timescale, it does propose a clear direction of travel for policy in these areas. While some recommendations are only partially agreed for specific reasons as set out below, the overall approach – which is comprehensive and detailed – is a helpful framework to help inform the future housing policy of the Council.

| <b>Panel Recommendation</b>  | <b>Response<br/>(Agreed/Not agreed/Partially agreed)</b>  |
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| <p>1) That the Council should positively promote images of living in social housing through our communications activities. The Council should be proud of its investment in social housing. It should promote its tenants as being from all walks of life and representative of what it means to live in Haringey. Haringey should not only be promoted as a place for people to move their businesses to and buy homes, we should also present images of a borough that listens to our tenants.</p> | <p><b>Agreed</b><br/>           The council agrees that promoting life in social housing in Haringey is an important element of its communications activities. The council will continue to promote investment in social housing, including announcing improvements to existing housing stock and delivery of new council homes as they are delivered. The council champions residents from all walks of life through its existing channels, including Haringey People magazine, Haringey People Extra e-newsletter, social media feeds, website and press releases. This work will continue, and the council will also explore other options for celebrating the borough’s different residents and communities, including working closely with Homes for Haringey on resident engagement and feedback.</p> |

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| <p>2) That the Council actively seek to change legislation on service charges meaning that all residents of a development irrelevant of their service charge can use the same entrance. Explore the possible use of concessions for social tenants.</p>     | <p><b>Partially agreed</b><br/>           People seeking to buy new build properties in flatted development expect high quality services, such as wi-fi, concierges, gyms, laundry services etc which are all paid for through service charges. As service charges must be set on the basis of actual costs, this means that they can often be very high indeed. And many of these may not be payable through Housing Benefit. In mixed tenure developments, this creates a significant problem. As it would not be legal to simply “overcharge” leaseholders to subsidise tenants, developers must either reduce services, making the flats less desirable to would-be purchasers, charge tenants a level of service charges that would make their home unaffordable or provide separate entrances (and/or restrict access to other facilities) so that they can charge different levels of service charges. It also needs to be recognised that most developments will have multiple entrances and for reasons of ease of management as well as service charge levels Housing Associations will want properties they are managing to be in the same block. This is therefore a tricky planning/housing issue and officers could be tasked to investigate further opportunities to either lobby for change in the law or to seek ways to make service charges more affordable.</p> |
| <p>3a) That the Council establish a wholly council owned development company to start building housing.</p>   | <p><b>Agreed</b><br/>           The Council is currently working on the establishment of a wholly owned company for housing development, and there will be a Cabinet report on this in July.</p>  |
| <p>3b) A target of 1000 council homes to be built by the council by 2022 through a combination of direct build and a wholly owned development vehicle. This should be in addition to properties built at affordable rent levels by external developers.</p> | <p><b>Agreed</b><br/>           As noted, the Council is working on the establishment of a wholly owned company for housing development. This company is one of the vehicles that could be used to build new council homes.</p>   |

| Panel Recommendation   | Response<br>(Agreed/Not agreed/Partially agreed)  |
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| <p>3c) The affordability target for developments to be enforced at 50% and the setting of a maximum threshold within that target which is allowed at 80% market rent meaning that when a development comes forward only a limited proportion is at the top end of 80%.</p> | <p><b>Partially agreed</b></p> <p>The adopted Local Plan policy is a 40% borough-wide target on a habitable rooms basis. To amend the target would require a review of the plan, which is a lengthy process and requires all policies to be supported by robust local evidence. It may therefore be best to rely on the adoption of the emerging London Plan and, therein, the aspiration towards a 50% affordable housing target. However, it is worth noting that over the plan period from 2011 to date, 50% of all new homes built were affordable including 70% on major schemes</p> <p>With respect to the setting of affordable rent thresholds, this is already set out in the Housing Strategy, having regard to what is affordable in a Haringey context depending on the size of the dwelling. It is also worth noting that the Mayor has now stopped funding Affordable Rent at 80% of market rents and also stopped allowing Registered Providers to convert Social Rent into Affordable Rent, so new schemes are much less likely to come forward with affordable rented homes at these levels of rent. We cannot however, as Haringey Council, change the government definition of affordable rented housing which includes the Affordable rent product, with rents at up to 80% of market rent.</p> |
| <p>4) The Council should in addition look at a variety of approaches, each one relevant to the individual site. This should include encouraging Community Land Trusts and Housing Cooperatives.</p>  | <p><b>Agreed</b></p> <p>The Council is currently working with StART to explore the possibility of a Community Land Trust on the St Ann's Hospital site, following the land being acquired by the GLA in May 2018. The Council will always be open to new or different approaches to delivering affordable housing, which may be appropriate for particular sites.</p>   |

| <b>Panel Recommendation</b>  | <b>Response<br/>(Agreed/Not agreed/Partially agreed)</b>   |
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| 5) That the Council set in place a local policy that student housing does not contribute to the affordability mix. | <b>Agreed</b><br>The Housing Strategy already states that 'there is no identified need for additional student housing in the borough and proposals to develop student housing would not normally be supported and, in any event, will not fulfil the council's expectations for affordable housing.' |

| Panel Recommendation   | Response<br>(Agreed/Not agreed/Partially agreed)  |              |    |       |   |   |                 |     |     |    |     |                  |       |       |   |       |
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| <p>6) Haringey needs a robust mix of different sized properties, especially more family homes. That the Council set and enforce clear targets on numbers of bedrooms in new developments</p> | <p><b>Partially agreed</b></p> <p>The Housing Strategy does set very clear guidance on what mix of different sized properties are needed for social housing.</p> <p>But for market housing, the issue of housing mix is complex and requires having regard to the existing housing stock and changes in that stock, as much as it does to new housing development. Other factors that need to be considered include the housing need requirement, changing demographics, the location of available land and the affordability of new and existing housing. In addition local policy needs to be in general conformity with the London Plan and within national planning policy. The existing Haringey housing policies reflect these factors, and it would not be possible to simply introduce and then strictly enforce bedroom targets. Further, any policy must be supported by evidence. In this respect, the Strategic Housing Market Assessment (SHMA) 2011 for Haringey suggests the following housing mix for the period 2015-2025:</p> <table border="1" data-bbox="1265 981 1915 1085"> <thead> <tr> <th>Bedroom Size</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>SHMA Target Mix</td> <td>41%</td> <td>47%</td> <td>0%</td> <td>12%</td> </tr> <tr> <td>SHMA Requirement</td> <td>6,158</td> <td>7,059</td> <td>0</td> <td>1,804</td> </tr> </tbody> </table> <p>Seemingly counter-intuitively, the SHMA concludes that Haringey has a significant surplus in 3-bedroom housing. But much of this is under occupied owner occupied housing, and the Council has limited levers to ensure fuller use of these homes. While some and should be released, through conversion, to help meet the need for smaller units, we can reduce housing need more effectively by protecting this stock and prompting this for private rented sector</p> | Bedroom Size | 1  | 2     | 3 | 4 | SHMA Target Mix | 41% | 47% | 0% | 12% | SHMA Requirement | 6,158 | 7,059 | 0 | 1,804 |
| Bedroom Size   | 1   | 2            | 3  | 4     |   |   |                 |     |     |    |     |                  |       |       |   |       |
| SHMA Target Mix  | 41%   | 47%          | 0% | 12%   |   |   |                 |     |     |    |     |                  |       |       |   |       |
| SHMA Requirement   | 6,158   | 7,059        | 0  | 1,804 |   |   |                 |     |     |    |     |                  |       |       |   |       |

| Panel Recommendation | Response<br>(Agreed/Not agreed/Partially agreed)  |
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|                      | <p>housing to meet the demand from the formation of single person households, through sharing. But house sharing will be not be appropriate or desirable for many residents, for whom 1 and 2 bed housing provision is required. This includes downsizing by those who are releasing 3 and 4 bed family housing. It is also noted larger family homes are located in more suburban areas of the borough, while new development is focused around town centres and transport hubs where higher density and smaller apartment type dwellings are more appropriate and deliverable.</p> <p>The situation is complicated by the emerging new London Plan. This increases Haringey's strategic housing target to 19,580 dwellings over the next 10 years, including 6,560 homes from small site development, to be delivered primarily through the conversion of family housing. It also suggests that two bed homes should be considered as providing family housing – and explicitly states that boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market or intermediate homes. In the light of this regional plan it would be difficult to set and enforce local size mix targets for market housing.</p> |

| <b>Panel Recommendation</b>  | <b>Response<br/>(Agreed/Not agreed/Partially agreed)</b>   |
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| 7) That a feasibility report be produced on the development of an in-house project team of architects, urban planners, and other professionals, to help improve quality and supply.  | <p><b>Agreed</b></p> <p>The Council will be carefully considering the skills it needs to support its new building programme and wider supply ambitions, and the options for plugging the current skills gaps. There are options to improve quality and increase/speed up supply other than an in-house team which could be considered alongside the recommended approach.</p>  |
| 8) That there be no sale of Council Land to companies for developments that fall below the minimum space standards. That homes developed to the minimum GLA liveability standards should not be accepted in the affordability mix. | <p><b>Partially agreed</b></p> <p>Sales of Council land is a decision for the Cabinet or Cabinet Member to take at the appropriate time and this can be a factor in any decision that they make.</p>   |
| 9) That all social housing should be built to the highest design and liveability standards. This should include resident involvement so we can find out what people actually want, rather than telling them what they want.        | <p><b>Partially agreed</b></p> <p>While it is accepted that all new social housing should be built to the highest standards, and residents should be involved in design, it is not always known which residents will live in new social housing. When new social housing is part of estate renewal then residents may be returning to live in the homes and would always be engaged appropriately. When new social housing is additional, then future residents are not yet known.</p> |
| 10) That all new social housing units built, with more than one bedroom, have separate kitchens.   | <p><b>Partially agreed</b></p> <p>All new social housing units will need to go through the planning process, and there is currently no policy in place specifying separate kitchens and living space. For new social housing built by the Council, this can be considered on a case by case basis.</p>   |

| <b>Panel Recommendation</b>   | <b>Response<br/>(Agreed/Not agreed/Partially agreed)</b>   |
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| <p>11) To use the capital budget to help bring homes up to the decent homes standard as soon as possible.</p> | <p><b>Agreed</b></p> <p>The Council has an ambition to go further than bringing all homes up to the Decent Homes Standard (DHS). The DHS does not fully reflect the needs of tenants in flats on estates in places like Haringey. The draft Asset Management Plan sets out a more holistic approach to stock investment that considers not only the investment needs to meet Decent Homes but also investment in communal work, such as cyclical decorations and the estate environment as a whole. This plan was developed in consultation with residents who wanted to see a broader scope of works in the future. The Medium Term Financial Strategy approved in February 2018 allocates additional HRA capital for investment in the Council's homes to achieve these aims. The current proposed programme will need some adjustment or additional investment to achieve the 95% commitment for decency by 2022.</p> |

| Panel Recommendation  | Response<br>(Agreed/Not agreed/Partially agreed)   |
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| <p>12) That the council strongly considers whether high-rise is suitable social accommodation for young families. Similar densities can be achieved through good humanly scaled design like in Islington and Pimlico.</p> <p>If a family on our waiting list is offered a property above the 5<sup>th</sup> floor, they should have the choice of refusing and waiting for an alternative offer. This should not count as their single offer.</p> | <p><b>Partially agreed</b></p> <p>The majority of new family units being delivered in tall buildings are on the lower floors, although there continues to be a demand for larger properties at higher levels for private sale. However, a blanket rule against such housing would limit the ability to provide new family sized housing as part of an overall housing mix, particularly in developments where the Council is seeking employment space on the lower storeys.</p> <p>At present, only 8% (789) of the Council's two bed and larger homes are situated above the 5th floor. Most of these are two bed homes, with only 93 of these being larger family homes with three or more bedrooms.</p> <p>Most Council housing is let through the choice based lettings system, which means that people would be able to choose not to bid for properties on higher levels if they would not be happy living in such properties.</p> <p>However, households in temporary accommodation usually have just one offer of accommodation and can only normally refuse this if it is deemed unsuitable. This policy could be amended to allow for a second offer where this refusal is a property above the fifth floor. But the Council would not wish to deem these homes as unsuitable for families by definition, as in many cases they provide good quality homes for existing tenants.</p> |

| <b>Panel Recommendation</b>  | <b>Response<br/>(Agreed/Not agreed/Partially agreed)</b>  |
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| 13) That all high-rise council blocks in Haringey have sprinklers even if it means retrofitting them, as the safety and peace of mind of our residents is paramount.   | <p><b>Partially agreed</b></p> <p>It is agreed that the safety of Haringey tenants and leaseholders is paramount and the Council needs to ensure compliance with all Guidance from Central government and the LFB. It is not yet clear what the final recommendations of the Grenfell enquiry or the review of building regulations will be. The recommendation to retrofit sprinklers is a welcome demonstration of commitment to fire safety and assurance. This needs to be taken forward in the context of available funding for this work, and whether the emerging reports on fire safety recommend other measures as more urgent. At present the additional funding from the Government does not cover retrofitting sprinklers. Provisions have been made within the Housing Revenue Account to retrofit sprinklers in high rise Council blocks and subject to Cabinet approval this can be incorporated into Homes for Haringey's Asset Management Strategy and Stock Investment Plan. However, committing to retrofitting of sprinklers at this point without fully understanding all of the recommendations may lead to installations being non-compliant with new regulations or guidance. Once new guidance is issued consideration also needs to be given to all additional fire safety measures, their impact on the building fabric and how they may interact.</p> |
| 14) As an alternative to demolition of estates, the council should consider increasing density on existing estates through adding floors to low-rise and using land space better to build further low-rise blocks. | <p><b>Agreed</b></p> <p>The Council and Homes for Haringey are currently considering the capacity for "top hatting" or adding additional storeys to existing Council buildings, but this investigation is in its early stages.</p>  |
| 15) That an exemption should be sought from the DCLG from the 1% rent  | <p><b>Partially agreed</b></p>  |

| Panel Recommendation  | Response<br>(Agreed/Not agreed/Partially agreed)  |
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| reduction, as well as further reductions, to Council and HfH properties within the HRA.   | The 1% rent reduction came first applied in April 2016, and is in force for four years until April 2019. The government have confirmed that from April 2020 rents will increase by inflation (CPI) + 1%. It is therefore highly unlikely that government would agree an exemption from the rent reduction for last year of this from April 2019, and would only consider this where a Council can demonstrate that it would make its Housing Revenue Account Business Plan unviable, which is not the case for LB Haringey. |
| 16) The Panel recommend that additional investment is made to ensure the cleanliness and upkeep of existing estates:  | <b>Agreed</b><br>Homes for Haringey is currently identifying the investment needed to specific estates and will present proposals to the Council for approval to commission this.   |
| 16a) That HFH instigate a regular cyclical decoration programme for all its estate, for the communal and external decorations required.   | <b>Agreed</b><br>Regular Cyclical decoration forms part of the holistic approach to stock investment as set out in Homes for Haringey's new draft Asset Management Plan.  |
| 16b) That HFH instigate a regular window-cleaning programme for all external windows on all its estates.  | <b>Agreed</b><br>Homes for Haringey is currently identifying the investment needed to implement a window cleaning programme on estates and will present proposals and options to the Council for approval to commission this.   |
| 16c) That HFH instigate facilities / resources to do a "deep clean" when needed on all its estates, internal communal areas.  | <b>Partially agreed</b><br>Homes for Haringey is currently identifying the investment needed on specific estates but further discussion is needed on what is required here before presenting proposals to the Council for approval to commission this.  |
| 17) When the council considers selling off land to a housing association or developer, that it undertakes tendering on a "Fixed Price" basis, in order to prioritise quality standards and affordability levels of new homes. | <b>Partially agreed</b><br>Sales of Council land is a decision for the Cabinet or Cabinet Member to take at the appropriate time and this can be a factor in any decision that they make.   |

| Panel Recommendation   | Response<br>(Agreed/Not agreed/Partially agreed)   |
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| <p>18) That a feasibility assessment be undertaken around applying to the DCLG for a local debt cap exemption for Haringey, following Treasury's announcement that authorities will be allowed to bid for increased HRA debt caps from 2019/20.</p>  | <p><b>Partially agreed</b><br/>When the government and GLA publish detail on the bidding process officers will assess the feasibility of bidding for additional borrowing capacity, and how this could contribute to the Council's plans to build new Council homes.</p> |
| <p>19) The Panel endorse the following recommendations for lobbying central government put forward by the Royal Town Planning Institute:</p> <ul style="list-style-type: none"> <li>· Remove the debt cap on the Housing Revenue Account.</li> <li>· Councils to retain all right-to-buy receipts and use them to build replacement housing.</li> <li>· To review the relevant weightings in the distribution of the £44bn housing subsidy (from Homes England via the GLA) to give more priority to social and affordable housing and less to market housing for sale.</li> <li>· To clearly state that local authorities can build and provide housing under housing companies created under the Localism Act</li> </ul> | <p><b>Agreed</b><br/>The recommendations in the RTPI report - if implemented by government - would allow the Council to build more affordable homes, and in particular more homes for social rent, so officers will continue to endorse these proposals publicly.</p>    |
| <p>20) That the Council make a commitment that affordable housing should be set</p>  | <p><b>Partially agreed</b></p>   |

| Panel Recommendation  | Response<br>(Agreed/Not agreed/Partially agreed)  |
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| <p>at social rent levels or equivalent. Only truly affordable homes for rent or shared-ownership should be classified as such.</p>  | <p>The Housing Strategy currently links affordability to incomes, rather than average house prices, to better reflect what is actually affordable to local people and prioritises social rented housing. Amending the Housing Strategy would be a decision for Full Council.</p> <p>National Planning Policy sets out the definition of affordable housing, which includes among other products, social rent, Affordable Rent (at up to 80% of market rent) and shared ownership. The Council through its determination of planning applications will prioritise affordable homes that are genuinely affordable - social rent homes for purchase by the Council, London Affordable Rent and London Living Rent.</p> |
| <p>21) That the Council be proactive in amending local policies, such as the Planning Policy and Housing Strategy to ensure that the delivery of housing in Haringey better meets the needs of all of its residents, such as affordable homes set at market rent levels. Having a clear policy setting out local criteria on affordability levels will help create a tougher planning regime and provide clear grounds to refuse unsuitable developments.</p> | <p><b>Agreed</b></p> <p>Amending the Council's Planning Policies is a long process and amending the Council's Housing Strategy requires Full Council approval. However it is noted that the Housing Strategy already has clear guidance on affordability, with the definition of an affordable amount to spend on housing costs defined as 40% of household income.</p> <p>The definition of affordable housing is set by government. We cannot change this definition locally. We can negotiate and use our powers as a Local Planning Authority to deliver affordable products that are genuinely affordable.</p>   |
| <p>22) That positive social impact should be at the heart of the Council's approach</p>   | <p><b>Agreed</b></p>  |

| Panel Recommendation   | Response<br>(Agreed/Not agreed/Partially agreed)  |
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| <p>to regeneration. In particular, the Panel emphasised the need to ensure that any regeneration programme put the physical and mental wellbeing of residents at the forefront of its aims. The Panel recommends that a robust matrix be developed which measures the social impact through the entirety of the regeneration process and accurately measures community benefit.</p>  | <p>Both the Tottenham and Wood Green Strategic Regeneration Frameworks place social value at the heart of the programme and the priorities have been developed through extensive engagement with local residents and stakeholders. Connecting local people to the business and job opportunities that emerge through regeneration and maximising the social value we extract through procurement are embedded in our approach to project development. The Council has been working closely with the GLA and Social Life to develop a robust framework to measure the social impact of our programmes.</p> |
| <p>23) The Panel commended the work done by Social Life to use a social sustainability framework to measure the impact of social regeneration. The Panel recommended that the work being done by Social Life and the GLA continue to be monitored and that Haringey adopt the use of the regional framework and accompanying performance indicators. The framework should underpin a systematic approach to measuring social impact and commissioning external projects across all regeneration areas in Haringey.</p> | <p><b>Agreed</b><br/>Social Life have completed their work for the GLA and the Council is now working with them to adopt the framework they produced. There is a further meeting with Social Life in June 18 to review the council's proposals with a view to fully adopting a social impact monitoring framework and system to support this by summer 2018.</p>  |
| <p>24) That the Council explore ways of promoting greater cooperation between the Council-led scrutiny process and the HfH scrutiny process in order to improve political oversight of HfH. It is recommended that the Councillors that sit on the HfH Board feed into scrutiny and give reports to the HRSP.</p>  | <p><b>Agreed</b><br/>The Council can explore this with the Homes for Haringey Board.</p>  |
| <p>25a) That the Council explore ways of having a broad representation of residents, leaseholders and resident's associations.</p>   | <p><b>Agreed</b><br/>The Council can explore this with the HfH Board.</p>   |
| <p>25b) It is also recommend that the Council set up an independent advocacy body for residents.</p>   | <p><b>Agreed</b><br/>The Council could facilitate this, for example by providing rooms for an independent advocacy body to hold meetings. However, other bodies (e.g. the CAB) may be better placed to set up an independent body.</p>  |



| Panel Recommendation | Response<br>(Agreed/Not agreed/Partially agreed)  |
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| 25c)                 | <p>regeneration and have seen how it has been put into practice elsewhere in London. This will help the champions input into the design process when plans for Northumberland Park start forming in a more detailed manner.</p> <p>For other areas of Tottenham which have been more focused around growth, where residents have been affected less directly, engagement with residents has primarily taken place through consultation around projects, the annual Tottenham wide community event, workshops and other such activities. Where there has been capacity to do so resources have been pooled to assist with engagement. For example, the engagement officers for Northumberland Park were utilised to encourage residents to respond to consultation on the High Road strategy.</p> <p>The Northumberland Park regeneration area is a very large site with 2,000 homes contained within it. It is challenging for two engagement officers to be accessible to all residents whilst also engaging with schools, businesses and organising events or other engagement related activities. Ahead of any partner providing additional resources it can be challenging to get accurate and informative messages out to everyone as plans develop. However, the personalised approach mentioned above was effective and it is envisaged that a similar eight week exercise will be carried out in the summer of 2018. There are not currently the resources to carry out the desired level of engagement on estates in growth areas but opportunities to leverage in funding to enable this are constantly being explored.</p> |

| <b>Panel Recommendation</b>   | <b>Response<br/>(Agreed/Not agreed/Partially agreed)</b>  |
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| <p>26) That a full consultation should be undertaken with residents of estates prior to any decision being taken in respect of estate regeneration. The consultation should also include a ballot of all residents and leaseholders on any affected estate.</p> | <p><b>Agreed</b><br/> Prior to any regeneration scheme, the Council has carried out extensive consultation and surveys, and the addition of formal ballots will be a useful extension of this to ensure that each scheme is taken forward with the support of the community. The precise methodology and timing of ballots will need careful consideration, to ensure that the most meaningful and appropriate impression of resident opinion can be discerned.</p> |