



Haringey Council

Report for:	Regulatory Committee 3 March 2015	Item Number:	
Title:	Consultation on Haringey's draft Housing Strategy 2015-2020		
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Ward(s) affected: All	Report for Key/Non Key Decisions: Key decision		

1. Describe the issue under consideration

- 1.1 This report seeks the views and recommendations of the Regulatory Committee on the draft Housing Strategy 2015-2020 for Cabinet to take into account when it considers the draft for approval for a six week consultation.

2. Recommendations

- 2.1 It is recommended that Regulatory Committee:
- a) notes the attached draft Housing Strategy (Appendix A) and provides comments to officers for reporting to Cabinet at its meeting on 17 March 2015; and
 - b) recommends to Cabinet (subject to 2.1 a) above) that it approves the attached draft housing strategy – with specific reference to the issues covered in paragraph 6.2 of this report – for a six week public consultation.

3. Alternative options considered

- 3.1 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



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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.

- 3.2 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.
- 3.3 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.

4. Background information

- 4.1 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.
- 4.2 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.
- 4.3 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.
- 4.4 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



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- 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

5. The draft strategy

- 5.1 Making Haringey's homes – of all tenures – fit to live in; affordable for residents and sufficient in volume to meet demand are some of the borough's greatest challenges and a top priority for the council. However, housing is also about enhancing the lives of the people who live in those homes, providing support and assistance to those who don't have a place to live and ensuring that the right infrastructure is in place to support local communities, growth and jobs.
- 5.2 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
- 5.3 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.
- 5.4 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
- 5.8 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.
- 5.9 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
- 5.10 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.

- 5.11 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
 - 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)
- 5.12 A full consultation report including a list of stakeholders consulted and feedback from respondents is contained in Appendix B.
- 5.13 The results from this consultation exercise were used to inform the development of the draft housing strategy presented to this Committee.
- 5.14 The comments of the Committee will be passed to Cabinet for consideration in their decision to approve the draft Housing Strategy for consultation. 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.

6 Links between the draft housing strategy and planning policy

- 6.1 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.
- 6.2 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 20th January 2015 notwithstanding the earlier recommendation of this Committee on 15th 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. For affordable rented homes, the council therefore expects a (borough wide) bedroom size mix, which provides:

- 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.

The bedroom size mixes shown above are borough wide targets. 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.

7 Comments of the Chief Finance Officer and financial implications

- 7.1 The costs of producing this strategy document and the related consultation process can be contained within existing budgets.
- 7.2 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.
- 7.3 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.

8 Comments of the Assistant Director of Corporate Governance and legal implications

- 8.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.
- 8.2 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,
- 8.3 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.
- 8.4 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."

- 8.5 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"*

- 8.6 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.

- 8.7 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”

8.8 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.

8.9 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.

8.10 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.

9 Equalities and Community Cohesion Comments

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

Objective	Recommendations
Objective 1, Improve help for those in housing crisis	<ul style="list-style-type: none"> • Introduce regular monitoring and analysis of lettings of social rented homes in terms of protected characteristics • 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. • 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
Objective 2, Ensure that housing delivers a clear social dividend	<ul style="list-style-type: none"> • Put in place equalities monitoring for all projects and activities which deliver new homes and jobs to ensure that all Haringey residents benefit proportionately • Where monitoring shows that residents with particular protected characteristics are not benefiting the reasons should be assessed and mitigating action put in place
Objective 3, Drive up the quality of housing for all residents	<ul style="list-style-type: none"> • Introduce regular monitoring of new developments to ensure they meet the needs of local people
Objective 4, Achieve a step change in the number of new homes being built	<ul style="list-style-type: none"> • 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.

10 Head of Procurement Comments

10.1 The draft Housing Strategy for 2015-2020 sets out a vast range of activities, which are summarised as four key outcomes:

- A. Improve help for those in housing crisis*
- B. Ensure that housing delivers a clear social dividend*
- C. Drive up the quality of housing for all residents*
- D. Achieve a step change in the number of new homes being built*

10.2 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.

10.3 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.

11 Policy Implication



11.1 The draft housing strategy is a document for public consultation and does not of itself have any policy implications. 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.

12 Reasons for Decision

12.1 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.

12.2 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.

12.3 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



13 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

14 Local Government (Access to Information) Act 1985

Haringey Council Corporate Plan 2015– 2018

Haringey Council Strategic Housing Market Assessment 2014

Haringey Council Local Plan 2013

Tottenham Strategic Regeneration Framework

Haringey Council Tenancy Strategy 2014

Haringey Council Allocation Scheme 2014

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

GLA Further Alterations to the London Plan 2014

Mayor of London, London Housing Strategy, 2014

National Planning Policy Framework