

Appendix 1 - Draft Schedule of Responses to Housing SPD

Name	Paragraph Referred to	Summary of Comments	Response
GOL	Section 8 – Housing Standards	<p>a) Including standards for dwelling mix in affordable housing and conversions, floorspace standards, private/community space and children’s play space may go beyond what is indicated by adopted UDP policy.</p> <p>b) Would the rigid use of minimum floorspace standards hinder the number of housing conversions so as to hinder the achievement of London Plan targets?</p>	<p>a - Standards included in the SPD are indicated as preferred rather than as requirements. Minimum standards, where adopted, continue policies as introduced by existing SPG. No change.</p> <p>b - Calculations of housing capacity and need within Haringey have taken place against a policy background in which the minimum floor space standards were adopted and as such were part of the consideration when housing targets were developed. Therefore, application of these minima should not restrict housing conversions in pursuance of the target. No change.</p>
GLA	2.4	References to the London Plan should read ‘London Plan – consolidated with alterations since 2004 (February 2008)’ in the first	Noted. Amendment will be made.

		instance and then the London Plan (2008).	
	2.6 – 2.7	<p>Policies that were incorporated as part of the Further Alterations to the London Plan 2008 should be referenced here:</p> <p>3A.7 ‘Large residential developments’</p> <p>3A.6 ‘Quality of new housing provision’</p> <p>3A.11 ‘Affordable housing thresholds’</p> <p>4B.1 ‘Design principles for a compact city’</p> <p>Para 3.68 boroughs should undertake comprehensive assessments of need for extra care homes, residential care homes, nursing care homes or other appropriate specialist housing for older persons.</p>	Noted. Reference to policies 3A.7, 3A.6 and 3A.11 will be made.
	4.1	<p>a) Welcome reference to Haringey’s annualised housing target but 10 year target should also be mentioned.</p> <p>b) The London Plan AMR</p>	<p>a – suggested amendment to paragraph 4.1</p> <p>The assessment underpins the borough housing targets in the London Plan (2008) to provide an average of 680 units per annum and 6800 units during the plan period.</p>

		(Feb 2008) notes that Haringey has averaged 38% of its affordable housing target over the last 3 years and this could be referenced in light of the need to continue social housing provision in the borough.	The Council believes that the level of affordable housing need within the borough adequately supports the need for further social housing provision without referring to past performance.
	4.3	Data for 2008, if available, could make this as up to date as possible	Agreed. March 2008 figures will be included in the adopted SPD.
	4.5	Targets for Haringey Heartlands and Tottenham Hale should be included in line with London Plan/OAP4.F	It is not felt that the inclusion of these targets will enhance the Housing SPD. The SPD does not focus on the delivery of specific schemes but rather on achievement of general principles set out for housing in the UDP and London Plan (2008). No change.
	4.6-4.7	The link between Growth Area Funding and additional funding required to meet cumulative impacts needs to be expanded on. Health contributions do not take into account cumulative impacts of smaller schemes in the way that education contributions do. This should be considered.	The Housing SPD is not considered to be a suitable vehicle in which to expand upon funding requirements for development. The Council has adopted SPG 10a Planning Obligations which refers to planning gain and funding in more detail. No change.
	5.1	Definition for affordable	Amend paragraph. 5.1 below UDP definition:

		housing should be in line with London Plan policy 3A.8. Introduction to the varieties of affordable housing types would be useful.	<p>The London Plan (2008) further defines Affordable Housing in Policy 3A.8 as 'housing designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in their borough'</p> <p>An introduction to the types of affordable housing is included in paragraphs 5.2-5.5 of the draft SPD.</p>
	5.8	Needs requirements could be more clearly and quantifiably drawn out, perhaps as a table.	In light of the changes envisaged as part of the development of the Haringey Core Strategy it is felt that an illustration of needs requirements rather than detail would be more appropriate in the Housing SPD. Findings of the North London Sub Regional SHMA will provide more guidance.
	5.17-5.18	It might be useful to divide this section or add a subtitle 'Thresholds for affordable housing'	Noted.
	5.27-5.29	Argument for 50:50 split between social rented and intermediate affordable housing provision is not accepted. It is not in general conformity with the London Plan split of 70:30. The proposed tenure split does not follow logically from the evidence presented in LB Haringey's housing needs assessment.	To bring the SPD into conformity with the London Plan (2008) the SPD will be amended to require a target split of 70% socially rented and 30% intermediate affordable housing across the borough. The need for a different proportional split will be explored during the development of the Core Strategy.

		Any policy variations from a 70:30 tenure split needs to be justified by local borough circumstances. Exception to an overall split that more closely meets the 70:30 split set may be identified with regard to specific areas in the borough where an existing very high proportion of current stock is social rented.	
	5.31	Last sentence is ambiguous.	Suggest amendment paragraph 5.31. In order to address this polarisation the council will seek a more...This assessment will be used to determine the circumstances under which 100% social rented affordable housing will be acceptable
	5.32	Using the needs assessment, this could be further clarified by setting out which proportion of intermediate housing units should be 3 and 4 bed.	Table 7.3 of the SPD sets out the affordable housing dwelling mix for both social rent and intermediate housing. It does not differentiate between the two. There may be scope to set out the proportion between social rent and intermediate housing as part of the Core Strategy.
	5.35	Habitable room calculations of affordable housing are useful for assessing whether individual schemes are providing the maximum reasonable amount of	In line with current GLA guidance Haringey Council calculates the level of affordable housing in individual schemes based on the number of habitable rooms. A count of the number of affordable housing units will still be used to assess the level of provision across the borough.

		affordable housing. Policy 3A.9 of the London Plan states that 50% of housing provision should be affordable. This should be based on the number of units across all developments.	
	5.41	Clarify last sentence – does it imply that the cost of transfer to an RSL will be higher in instances where there is no grant funding available?	Yes, if grant isn't available to an RSL then the developer would have to pay more for affordable housing.
	5.42 (&5.35)	SPD should refer to a requirement for a 'full financial appraisal to be submitted on a confidential basis'. Reference to GLA development control toolkit is welcome.	Support noted.
	5.43	Paragraph 3.57 of the London Plan sets out that the financial contributions or off-site provision 'should only be considered where a site is identified and delivery is certain.' Para 3.58 refers to further guidance on the	Suggest amendment to paragraph 5.45: The alternative site should be identified and deliverable. It should provide nominations in perpetuity and will preferably be located within the borough.

		criteria for this in the Mayor's Housing SPG which should also be reflected in the SPD.	
	6.1	Guidance provided on density in the SPD is generally in line with the UDP policy. The SPD should note that London Plan Policy 3A.3 'Maximising the potential of sites' and table 3A.2 can be applied directly to the borough's planning decisions.	Duly Noted.
	6.14 & 8.30	Socially inclusive design policies are supported. SPD could refer to the Mayor's Accessible London SPG which provides further guidance on matters relating to Lifetime Homes and wheelchair housing.	Support noted.
	7.6	Table 7.2 should be disaggregated between social housing and intermediate provision and, taking account of Chapter 111 of the Mayor's Housing	Haringey's Housing Needs Assessment does indicate the need to provide a higher level of 3+ bedroom accommodation in the social rented sector.

		<p>SPG, should set out a higher requirement for family-sized social housing in comparison to intermediate provision. In general, the SPD should have regard to London's wider housing need and set out the local, sub-regional and regional level of need. Local circumstances will not always override existing London-wide need to deliver certain types of housing.</p>	
	8.13	<p>Statement is supported, but, as the UDP has no specific policy on playspace, London Plan Policy 3D.13 'Children and young people's play and informal recreation strategies' can be directly applied and the SPD should highlight this. It would also be useful to reference the standards set out in the providing for children and young people's informal play and recreation' SPG.</p>	<p>Support noted. Suggest amendment to paragraph 8.13: New residential development of 5 units and over should make a contribution towards children's play space. Table 1.1 of The Local Open Space and Recreations Standards SPD, adopted in June 2008, provides more detail.</p>

HFRA	Section 1 – Affordable Housing	<p>a) Affordable & Social housing targets are consistently not being met.</p> <p>b) 'Affordable housing' is too expensive and the definition should be changed.</p> <p>c) Extremely low percentages of social housing means less homes for those who need it most.</p> <p>d) Need to find solutions to prevent 'buy to let' domination of new 'market' housing.</p>	<p>a & c - We understand the HFRA's concerns regarding the level of affordable housing achieved in the borough in the past. This is also a concern for the Council and in the development of the new Core Strategy the Council will be exploring the option of reducing the threshold for affordable housing contributions below the 10 unit threshold stated in UDP policy HSG4. Any proposal to reduce this threshold will need to be tested through the Local Development Framework process of plan preparation. We are also working to seek a high level of affordable housing on larger development sites within the borough.</p> <p>b - Haringey council makes every effort to secure a mix of affordable housing both in the form of intermediate housing and socially rented housing. Affordable housing encompasses both intermediate housing, wherein residents purchase a proportion of the property with the option of proceeding to full ownership, and socially rented housing for which target rents are set by the government. Target rents are priced at a level that is affordable to those on low incomes. Intermediate housing is priced at a level set by the GLA in the Mayors Housing SPG. At Haringey we are concerned with ensuring that the opportunity for a decent home is open to everyone. We make every effort to ensure that intermediate housing is subsidised at a level that opens up the possibility of owning a share of their home to more people. This is funded through a combination of local and national government funding and contributions from registered social landlords and developers. Funding from these sources is limited. The choice has therefore been made to target a lower level of subsidy at a greater number of people. House prices across the housing market have increased dramatically over recent years and the level of intervention required to bring prices within the reach of people who would find current intermediate housing expensive, would be outside of the reach of current funding streams. In addition, people that are unable to access housing at this subsidised level may find it difficult to obtain and/or service mortgages.</p>
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			d – The purchase of market housing by ‘buy to let’ investors, is outside of the scope of the planning system to prevent. Market housing is available to anyone able to pay for it. However, the Council is committed to ensuring that properties are not left empty. The 2005-2008 Empty Property Strategy is in the process of being updated and this works on both bringing empty properties back into use and targeting long term vacant property. In addition the Council is also working with private landlords to ensure that selected people on the social housing register can access private rental properties through the Direct Letting Scheme and Haringey Homes Direct.
	5.15	Add text – borough target of 50% <u>of additional units.</u>	The addition to the text would imply that the Council only seeks affordable housing from new development. The council will seek affordable housing in all developments over the 10 unit threshold, including the development of replacement units.
	5.18	Add text - Proportion of affordable housing will be calculated by number of habitable rooms <u>as well as</u> units	In line with current GLA guidance Haringey Council calculates the level of affordable housing in individual schemes based on the number of habitable rooms. A count of the number of affordable housing units will still be used to assess the level of provision across the borough.
	5.20	Add text - ...severe need for affordable housing in the borough. <u>Therefore the maximum percentage of affordable units will be sought from such sites</u> (to meet targets for affordable housing)	The regeneration areas at Tottenham Hale and Haringey Heartlands are major opportunities for the Council to make significant contributions to the provision of affordable housing within the borough. However, the need for affordable housing needs to be balanced with the need to ensure that both areas function as mixed and balanced communities. The number of affordable units sought will be at or above the target in line with policy.
	5.29	Amend targets for housing... a) Social rented – 70%	To bring the SPD into conformity with the London Plan (2008) the SPD will be amended to require a target split of 70% socially rented and 30% intermediate affordable housing across the borough.

		b) Intermediate – 30% (to meet targets for affordable component of additional homes)	
	5.33	Add text - ...affordable housing will <u>also</u> be calculated by habitable rooms <u>as well as</u> by units.	Please see response to 5.18 above.
	5.43	Add text - ...there may be <u>exceptional</u> physical or other circumstances...	Suggested text amendment: There may be exceptional circumstances where off site provision of affordable housing may be preferable to on site provision. For example, where off site provision would be of superior quality to that provided on site.
	Section 2 – Housing Density	<p>a) Scale, character and density of housing development is untested, risky and controversial, and in urgent need of appraisal and amendment.</p> <p>b) Current infrastructure is inadequate to deal with current population levels, let alone greater and denser population levels.</p> <p>c) Amenities/facilities that help create sustainable communities are</p>	a, b, c - The policies guiding the density of housing development in the Haringey Unitary Development Plan have been developed with regard to a number of factors including urban form, levels of accessibility to public transport and accessibility to goods and services. In addition SPD must be in conformity with higher level planning policy. The London Plan seeks to guide the density of housing development in urban areas to between 200 and 700 habitable rooms per hectare as set out in Table 3A.2 of The London Plan. The London Plan further refines the indicative range with reference to the accessibility levels of housing development using the index of public transport accessibility. The Council seeks to ensure that higher density levels are only implemented in well designed schemes that address the needs of residents both within the development itself and with regard to residents' ability to access an acceptable level of goods and services within the local area. Contributions to local facilities are negotiated as part of planning gain agreements to ensure that the level of access is maintained at an acceptable level.

		<p>inadequate for current, let alone denser population levels.</p> <p>d) Policies promoting highly intensive residential development are at odds with policies promoting sustainable communities.</p>	<p>d – It is not considered that policies promoting intensive residential development are at odds with policies promoting sustainable communities. Truly sustainable communities must be environmentally sustainable. The compact city model upon which The London Plan (2008) is based holds that high density residential development contributes to the sustainability of communities, (in particular their environmental sustainability) provided that access to goods, services and residential amenities are maintained.</p>
	6.1	<p>Table 3.A2 of the London Plan...should read 'Table <u>4.1B</u>'</p>	<p>The reference to Table 3.A2 is correct. The reference to the London Plan relates to 'The London Plan – consolidated with alterations since 2004' (February 2008). To clarify this matter the Housing SPD will refer to The London Plan (2008) in the adopted version of the document.</p>
	6.1	<p>Remove Text – In exceptional circumstances this range may be exceeded. The specific circumstances under which this range may be exceeded are set out in policy HSG9 of Haringey's UDP.</p>	<p>Suggest text amendment 6.1</p> <p>In exceptional circumstances this range may be exceeded. The specific circumstances under which this range may be exceeded are laid out in policy HSG9 of Haringey's UDP.</p> <p>Substitute</p> <p>The density ranges are indicative, and higher densities may be acceptable provided that the criteria set out in policy HSG 9 of the UDP are satisfied.</p>
	6.2	<p>Remove text - Haringey is a design-led borough. (statement is unhelpful and meaningless, unless existing Housing Standards are improved and enforced)</p>	<p>Suggest amend text 6.2.</p> <p>However, these density ranges are indicative only, and a secondary consideration to the achievement of high quality design. Haringey is a design led borough. This means that development proposals must display high design quality first and foremost. This principle is particularly important in cases of</p>

		<p>Add text (replace with) – <u><i>These density ranges are for guidance and the achievement of high quality design is of equal importance.</i></u> (Density is an important consideration and its importance is recognised by UDP and London Plan. It is not secondary to other considerations including 'high quality design')</p>	<p>higher density development proposals.</p> <p>Substitute</p> <p>High quality design is of primary importance in Haringey and high density development will only be acceptable where proposals display high design quality.</p>
	6.6	<p>'Habitable rooms' needs defining. Make clear definition in Para 7.9 applies to earlier chapters. Existing SPG3a page 2 paras A1 and A2 are better. Why has a subdivisible large room decreased from 20m² in the SPPG to 18.5m² in para7.9? We propose a definition be added to Para 6.6 and that it include a subdivisible large room of floor area greater than 20m².</p>	<p>Habitable rooms are defined in the glossary of the UDP and in paragraph 7.9 of the draft Housing SPD.</p> <p>Typo in paragraph 7.9 should be 20m².</p> <p>Minimum internal space standards for dwellings were originally enforced by the 1969 Housing Act. These 'Parker Morris' standards were repealed by the Local Government, Planning and Land Act of 1980. Since the repeal of the standards, Haringey council, in common with many other local authorities, has continued to adopt minimum space standards as part of the development plan for the local area. These standards are comparable to the 'Parker Morris' standards and represent the midpoint of the floorspace standards in 'The Housing Quality Index' measure. The need to provide a greater number of homes within the borough must be balanced with the need to ensure that homes are well designed with an appropriate amount of usable living space. To this end Haringey council seeks to maintain both the overall dwelling size minima and floorspace minima for individual rooms in the proposed Housing SPD (see Table 4 – Haringey Council</p>

			<p>SPG 3a (2006) and Figure 8.1 – Haringey Council, Draft Housing SPD (2008)). The area of a subdivisible large room will therefore be maintained at 20sq.m.</p> <p>The HFRA may be interested to note that the Mayor of London is currently considering the reintroduction of ‘Parker Morris’ style standards within the capital as part of the Housing Design Guide proposed in 2007.</p>
	6.10	<p>Site Area Apportionment methods should be made clear to remove ambiguity in discussing an application. (Draft SPD says can use two methods)</p>	<p>Density calculations can be very complex. We have included the site apportionment methods used by the Council within the SPD to provide transparency.</p>
	Section 3 - Dwelling Mix	<p>a) Targets/recommendation for 3 or 4 bed component of affordable housing are being missed. Need to impose and enforce conditions on development.</p> <p>b) Issue of developers gaining permission for a certain no of habitable rooms, then adding more rooms to make profit and avoid s106 obligations.</p>	<p>We understand the HFRA’s concerns regarding the number of three and four bedroom affordable dwellings being built across Haringey. In light of the findings of the 2007 Housing Needs Assessment we will be making every effort to ensure that these targets are met in the future and are supported by the emerging Core Strategy.</p> <p>Building Inspectors from the Council inspect completed buildings using the agreed plans. Where these are not in compliance with the agreed plans, retrospective planning permission may be necessary. Any additional planning obligations would be negotiated as part of this process.</p>
	7.8	Reference to a ‘Table 5.’	Amend Para 7.4 – However, table 7.2, below, identifies that the requirement....

		There is no such table.	<p>Amend Para 7.5 – The recommended mix for affordable housing developments is shown in Table 7.3.</p> <p>Amend Para 7.6 – Table 7.3, above, does not differentiate between....</p> <p>Amend Para 7.8 – The Council will normally require all conversions to provide a mix of units in accordance with Tale 7.4.</p>
	7.9	Amend to - floor area greater than <u>20m2</u> .	<p>Typo in paragraph 7.9 should be 20m2.</p> <p>Minimum internal space standards for dwellings were originally enforced by the 1969 Housing Act. These 'Parker Morris' standards were repealed by the Local Government, Planning and Land Act of 1980. Since the repeal of the standards, Haringey council, in common with many other local authorities, has continued to adopt minimum space standards as part of the development plan for the local area. These standards are comparable to the 'Parker Morris' standards and represent the midpoint of the floorspace standards in 'The Housing Quality Index' measure. The need to provide a greater number of homes within the borough must be balanced with the need to ensure that homes are well designed with an appropriate amount of usable living space. To this end Haringey council seeks to maintain both the overall dwelling size minima and floorspace minima for individual rooms in the proposed Housing SPD (see Table 4 – Haringey Council SPG 3a (2006) and Figure 8.1 – Haringey Council, Draft Housing SPD (2008)). The area of a subdivisible large room will therefore be maintained at 20sq.m.</p> <p>The HFRA may be interested to note that the Mayor of London is currently considering the reintroduction of 'Parker Morris' style standards within the capital as part of the Housing Design Guide proposed in 2007.</p>
	Section 4 – Housing Standards	a) Becoming a 'design-led borough' would require improving and revising existing and proposed	<p>The Council has expressed its intention, as part of the adopted Sustainable Community Strategy, 2007 -2016, to 'encourage better building design and standards across Haringey'. The statutory planning system is a key agent in the delivery of this aim and as such we will be working towards improving standards through the Local Development Framework process.</p>

		standards. b) Clear standards for every developments impact on and contribution to the street scene are required.	
	8.1	Reference to a Table 6, there is no such table.	Amendment to paragraph 8: ...will normally be required to conform to the minimum space standards shown in Figure 8.1.
	8.4	Error in Fig 8.1 in which storage space has been forgotten in the equation.	Whilst there is a requirement that storage space will be provided in all residential units, minima are not included within the SPD.
	8.13	The trigger size of development for an obligation to include a fully equipped play space seems far too low.	The threshold is set at a level which takes into account minimum residential densities, child yield from the development and the likely minimum suitable size for a given type of open space. Para 8.13 stipulates that development over five units should make a <i>contribution</i> towards children's play space within the development, not that <i>a fully equipped play space</i> should be provided.
	8.27	Para B1 pg 4 of SPG3 provides better protection for light conditions and should be restored.	Suggested amendments to text: 8.25 The Council expects new development to be laid out in a way that allows for adequate natural lighting to reach both the development and adjoining properties in line with the BRE Standard...In addition, reference should be made to the Code for Sustainable Homes which addresses standards for daylight. 8.26 New development will be assessed to ensure that the building layout

			maintains acceptable levels of daylight and sunlight to appropriate existing windows ... 8.27. Delete
Liz Lightbourne - Environment Agency	4.7	Add to list – <u><i>The Sequential Test and locating development in areas of the lowest flood risk.</i></u> (This is in line with PPS3 and PPS25)	Agree amendment.
	6.14	Support the criteria set to achieve level 3 of the Code for Sustainable homes.	Support noted.
National Grid Property	5. Affordable Housing	Support affordable housing provision. In sites with significant remediation costs the 50% target should be applied pragmatically in association with detailed viability assessments.	Support noted.
	5.18	Supports method of calculating 'affordable housing provision' as habitable rooms instead of units which will give developers and Resident Social Landlords (RSL's) greater flexibility.	Support noted.

	5.29	Supports the 50%-50% dwelling mix which will create balance.	To bring the SPD into conformity with the London Plan (2008) the SPD will be amended to require a target split of 70% socially rented and 30% intermediate affordable housing across the borough.
	6.2	Design led approach to development should be adopted and density considerations should be considered on a case by case basis.	<p>The Council has expressed its intention, as part of the adopted Sustainable Community Strategy, 2007 -2016, to ‘encourage better building design and standards across Haringey’. The statutory planning system is a key agent in the delivery of this aim and as such we will be working towards improving standards through the Local Development Framework process.</p> <p>Suggest amendment to paragraph 6.2.</p> <p>However, these density ranges are indicative only, and a secondary consideration to the achievement of high quality design. Haringey is a design led borough. This means that development proposals must display high design quality first and foremost. This principle is particularly important in cases of higher density development proposals.</p> <p>Substitute</p> <p>High quality design is of primary importance in Haringey and high density development will only be acceptable where proposals display high design quality.</p>
	6.12	‘Pepper potting’ can create additional management difficulties for RSL’s. Prefer to separate affordable and private housing units within developments.	Whilst we recognise the management challenges faced by RSL’s introduced by dispersing affordable housing in clusters across a development these challenges can be overcome by careful management arrangements. The Council feels that fully integrating affordable housing within developments contributes to social cohesion. Clustering is a pragmatic approach to integrating affordable housing within developments and enables RSLs to manage properties effectively.
	7. Dwelling Mix	Council’s preference to provide 3 and 4 bedroom	Paragraph. 7.2 states a <i>preference</i> on the part of the Council. It does not prescribe a requirement for 3+ bed homes to be provided as houses.

		units as houses instead of flats is too prescriptive. Provision of 3 and 4 bedroom houses would significantly reduce the development potential of the Haringey Heartlands site. This is in conflict with policy 3A.3 'maximising the potential of sites' of the London Plan.	
	8.2	Only habitable rooms should be required to have adequate natural light.	Habitable rooms do not encompass kitchens below 13sqm, it is, however, appropriate for natural light to be available in kitchens. Suggest amendment to paragraph 8.2 All habitable rooms and kitchens must be of a regular shape, have adequate natural light and ventilation and have a minimum floor to ceiling height of 2.3 metres. Bathrooms and WCs must be of a regular shape and be adequately ventilated.
	8.21	The requirement to increase by 10m for each additional storey the minimum distance that rear facing habitable rooms should be set apart is restrictive and unnecessary.	In line with SPG 3b Privacy/Overlooking, Aspect/Outlook and Daylight/Sunlight Para 2.1 the existing standard will be maintained.
Ron Greenw	5.3	Nominations should be in accordance with the North	The North London Sub-Region Nominations Agreement is a mechanism whereby participating local authorities can share nominated units within the sub-region.

ood – Circle Anglia		London sub-region nominations agreement for the rented homes.	Under this agreement councils seek to secure 100% nomination rights prior to any subsequent sharing of the rights.
	5.18	Support affordable percentages being based on habitable rooms, not units. Recommend floor space as further means of calculation.	In line with current GLA guidance Haringey Council calculates the level of affordable housing in individual schemes based on the number of habitable rooms. A count of the number of affordable housing units will still be used to assess the level of provision across the borough.
	5.29	Support borough's 50/50 tenure target mix, how will this tenure balance be reconciled with the GLA's 70/30 target?	To bring the SPD into conformity with the London Plan (2008) the SPD will be amended to require a target split of 70% socially rented and 30% intermediate affordable housing across the borough.
	5.31	Supports avoiding 100% social rented schemes in some wards. Besides the ward profile, scheme types should be considered. For instance, housing for older people, supported housing could be regarded as social rent but nevertheless may be regarded as acceptable.	<p>The circumstances outlined would appear to be encompassed by paragraph 5.31.</p> <p>Suggest amendment to paragraph 5.31</p> <p>In order to address this polarisation the council will seek a more...This assessment will be used to determine the circumstances under which 100% social rented affordable housing will be acceptable.</p>
	5.32	Concerned about lack of a market for 3 bed + shared ownership homes. Ask the borough to demonstrate the need for such homes to	In light of the findings of the 2007 Housing Needs Assessment we will be making every effort to ensure that targets for the provision of three plus bedroom properties are met in the future and are supported by the emerging Core Strategy.

		justify this policy.	
	5.33	As long as it is recognised that a precisely 50% for each tenure will not be mathematically achievable using habitable rooms.	No comment.
	5.35	Agree with proposed approach.	Support noted.
	5.42	Support use of a consistent approach to testing viability such as the GLA toolkit.	Support noted..
	5.43	Agree with this approach.	Support noted.
	6.2	Support 'design led' approach. Setting out design requirements in a single document may borough achieve its objectives.	<p>Suggest amendment to text 6.2.</p> <p>However, these density ranges are indicative only, and a secondary consideration to the achievement of high quality design. Haringey is a design led borough. This means that development proposals must display high design quality first and foremost. This principle is particularly important in cases of higher density development proposals.</p> <p>Substitute</p> <p>High quality design is of primary importance in Haringey and high density development will only be acceptable where proposals display high design quality.</p>
	6.11	Pepper Potting introduces legal complexity. If there are rented homes in a predominantly private or shared ownership	Whilst we recognise the management challenges faced by RSL's introduced by dispersing affordable housing in clusters across a development these challenges can be overcome by careful management arrangements. The Council feel that fully integrating affordable housing within developments contributes to social cohesion. Clustering is a pragmatic approach to integrating affordable housing

		core/block, in time the lessees may staircase out and opt for leasehold enfranchisement for that block. This would leave the tenants obliged to pay service charges that either they or we have any control over.	within developments enables RSLs to manage properties effectively.
	7.1	Support the statement and policy approach.	Support noted.
	7.5	Would ask borough to demonstrate the need for 3+ bed shared ownership. (as in response to 5.32) Query what happens when an RSL wishes to provide a 100% affordable scheme. The private mix on 50% of the site should be used or RSL's will be at a disadvantage. Recognise preference for 3 bed+ to be provided as houses. if this becomes a requirement would adversely impact on supply.	See comment in relation to paragraph 5.32 above. Where an RSL wished to provide a 100% affordable scheme it will be expected that this will comprise of socially rented and intermediate housing. In line with paragraph 5.13, 100% socially rented developments will only be acceptable in a limited range of circumstances. Para. 7.2 states a <i>preference</i> on the part of the Council. It does not prescribe a requirement for 3+ bed homes to be provided as houses as the Council recognises the effects this may have on supply.
	8.1	Propose the use of HQI minimum space standards,	The Housing Quality Index measure has been used as a measurement of quality for a number of years. The HQI indicates a range of floorspaces and allocates a

		not the mid-point of HQI standards.	score to help assess the quality of homes. The decision to use a single figure as an ' <i>indicative floor area</i> ' has been made to simplify understanding within the SPD.
	8.3	Support internal storage requirements	Support noted.
	8.9	Minimum private garden space at 50 sq m is too ambitious. Will conflict with borough's current urban density and adversely impact on housing supply.	All new residential development should provide external amenity space and this should be appropriate to the needs of the likely occupants. 50m2 private garden space for family housing does not adversely impact on housing supply. No change.
	8.13	Will await Local Open Space and Recreations Standards SPD before commenting on this requirement.	The Local Open Space and Recreations Standards SPD was adopted in June 2008.
Thames Water	4.5, 4.6, 4.7	There should be a reference to utility infrastructure being required in this section of the SPD.	Suggest amendment to paragraph 4.5 ...this uplift in housing delivery is dependent on the provision of supporting infrastructure in these areas, such as transport, utilities, education and health facilities...
	6.14	A full points score needs to be achieved in the water efficiency section if a development is to be considered water efficient.	Duly noted, however paragraph 6.14 refers to standards required for the grant of National Affordable Housing Programme funding. At present this requires achievement of Level 3 in the Code for Sustainable Homes with full points awarded for Security in category 8. 'Design and Quality Standards' (NAHP, 2007) contains full details.
Theatres Trust		This consultation is not directly relevant to the Trust's work and therefore	No comment.

		we have no specific comment.	
British Waterways London		Request the Housing SPD emphasises the role of residential moorings in adding to the borough's housing stock and providing an alternative housing type. (Para 4.117 of London Plan acknowledges the need for and the shortage in supply of residential moorings.)	The Housing SPD must be in general conformity with the adopted Unitary Development Plan. The need for more residential moorings within Haringey was not explored during the UDP process. There is, however, scope to assess the need for moorings during the preparation of the Core Strategy which will form part of the new Local Development Framework for Haringey.
Highgate Society	Main Concern	Concerned by the recent increase in planning applications involving the demolition of detached residential dwellings and their replacement with larger dwellings, often referred to as 'trophy homes.' Most of these applications are occurring in Conservation Areas and have generated opposition from residents. Believe council urgently needs to set out policies for such developments to remove the uncertainty associated	UDP policy CSV7 sets out the Council's approach to demolition of buildings in conservation areas. We appreciate the Highgate Society's concern regarding the replacement of existing dwellings with larger homes but cases must be judged on their individual merits in line with Policy CSV7 and the stated aims of the Conservation Area. There may be scope to strengthen the guidance through the Local Development Framework process.

		with such planning applications. Section B is a set of criteria developed by the Society which it believes might form the basis for the development of the council's official policy.	
	6.6	Unclear as to meaning of this paragraph. May need to be rewritten so that it is easier to interpret.	Density calculations can be very complex. We have included the density calculation methodology within the SPD to provide transparency.
	6.2	Amend wording so as to state that the 'design-led' character of the policy should apply particularly to developments in conservation areas. The document should make reference to the Council's policies in such areas which are not addressed specifically elsewhere in it.	Suggest amendment to text 6.2. However, these density ranges are indicative only, and a secondary consideration to the achievement of high quality design. Haringey is a design led borough. This means that development proposals must display high design quality first and foremost. This principle is particularly important in cases of higher density development proposals. Substitute High quality design is of primary importance in Haringey and high density development will only be acceptable where proposals display high design quality.
	5.29 & 5.31	In general supports the paragraphs but does not believe the intention of these particular paragraphs is easy to understand.	Suggest amendment to paragraph 5.30. ...Conversely, households renting housing from the Council or an RSL are concentrated in the east of the borough. <i>Remove final sentence.</i>

		Current phrasing is open to conflicting interpretation. Council should explicitly state that the intention of policies will be to increase the share of new build that constituted either affordable housing or rented accommodation in those wards with high levels of owner occupation.	<p>Suggest amendment to paragraph 5.31</p> <p>In order to address this polarisation the council will seek a more...This assessment will be used to determine the circumstances under which 100% social rented affordable housing will be acceptable.</p>
English Heritage		SPD contains some good recognition of the significance of the historic environment. Particularly evident in paragraphs 2.1, 2.5, 6.4, 7.8, and 8.1.	Support noted.
	4.6	Historic environment should be added to the list of beneficiaries of planning obligations. The outcome of planning obligations should be to help ensure that proposed development protects and enhances the historic environment.	<p>Suggest amendment to Para 4.6 in line with paragraph 2.35 of the adopted UDP and SPG10a:</p> <p>Where additional housing creates a need for supporting facilities and infrastructure or action is required to mitigate the impacts of the development, the Council will negotiate planning obligations to secure contributions, either in kind or financial. In some case, financial contributions are 'pooled' to address the cumulative impacts of development within the locality. The following indicates some of the kinds of contributions that will be sought:</p>
	6.5	CABE Guidance on Tall Buildings (July 2007) is a material consideration for	The wealth of design guidance produced by various agencies can be extremely helpful in the planning and consideration of planning applications. The Council believes that the three design guides referred to in paragraph 6.5 are the most

		<p>planning applications and should be included as a reference to this paragraph. Also, Seeing the History in the View: A Methodology for Assessing Heritage Significance Within Views (April 2008) is also likely to be of relevance when it is published in autumn 2008.</p>	<p>widely applicable to the types of application made in Haringey and are therefore referred to specifically in the SPD.</p>
	8.14	<p>Need to introduce a caveat paragraph to sections on “Extensions as Part of Conversions” and “Extensions and Alterations” to indicate that additional or different design requirements may be necessary when dealing with alterations or conversions of listed buildings or those in conservation areas.</p>	<p>Extensions and conversions in Conservation Areas are guided by the advice contained in Section C of SPG 2 Conservation and Archaeology.</p>
	Sustainability Appraisal Scoping Report	<p>Serious concerns about the clarity and effectiveness of information. Not made clear what the relationship is between the SA and DPD.</p>	<p>An error on our part meant that the SA scoping report was sent out for consultation with the draft SPD. The SA has now been sent to all consultees.</p>
	SA Table	<p>Should include information</p>	<p>An error on our part meant that the SA scoping report was sent out for</p>

	2.1.1	that pertains to the sustainable achievement of the Housing SPD's objectives.	consultation with the draft SPD. The SA has now been made available to consultees.
	SA	Request inclusion of baseline information, including key targets and indicators. Combining landscape and cultural heritage into a single objective is problematic and contrary to appendix 9 of Govt Guidance.	An error on our part meant that the SA scoping report was sent out for consultation with the draft SPD. The SA has now been made available to consultees.
Metropolitan Police Authority		Keen to ensure the amount of intermediate housing suitable for police officers is maximised in Haringey.	The need for affordable housing needs to be balanced with the need to ensure that the borough functions as mixed and balanced communities. The number of affordable units will be at or above 50% of the total number of units in line with policy.
	5.4	Supports definition of Intermediate housing which includes key worker housing.	Support noted.
	5.5	Should make specific references to 'police officers' in the definition of key workers in Haringey.	Suggest amendment to paragraph 5.5: ...Key Workers in Haringey could include...police officers...
	5.29	Support paragraph.	Support noted.
	4.6	Should include 'policing facilities' as one of the provisions to be considered	Suggest amendment to paragraph 4.6: Where additional housing creates a need for supporting facilities and

		in planning obligations. As does Policy 3A.17 and 3A.26 of the London Plan which recognise 'policing facilities' as social infrastructure and strategic community related issues.	<p>infrastructure or action is required to mitigate the impacts of the development, the Council will negotiate planning obligations to secure contributions, either in kind or financial. In some case, financial contributions are 'pooled' to address the cumulative impacts of development within the locality. The following indicates some of the kinds of contributions that will be sought:</p> <p>The Council does not support the inclusion of a long list of the types of planning gain contributions that will be sought as part of development. This approach allows greater scope for negotiation. Further guidance is set out in paragraph 2.35 of the UDP and in SPG 10a Planning Obligations.</p>
	6.5	Should include a reference to 'Secured by Design' by ACPO and to the ODPM guidance 'Safer Places' as publications which should be used as reference material in working up development proposals.	The wealth of design guidance produced by various agencies can be extremely helpful in the planning of development and the consideration of planning applications. The Council believes that the three design guides referred to in paragraph 6.5 are the most widely applicable to the types of application made in Haringey and are therefore referred to specifically in the SPD.
Home Builders Federation	4.1	Unsure which set of data the council is drawing upon for this SPD, 2004 Housing Needs Studies or 2007 data. Housing Needs Studies are obsolete and have been replaced by Strategic Housing Market Assessments (SHMA's). Council needs to be wary of setting unrealistic	The Council has used the findings of the 2007 Housing Needs Assessment as part of the evidence base in the production of the SPD. Housing Needs Studies are not obsolete but form a key component of the evidence base from which to develop Strategic Housing Market Assessments. Haringey Council, as part of the North London Housing Sub-Region has taken the decision to produce a joint SHMA. The evidence from the SHMA will form part of the evidence base for the Core Strategy which the Council is in the process of preparing.

		regeneration plans if there is insufficient market demand from people to live in areas such as Tottenham Hale and Haringey Heartlands.	
	Table 1	Vacant units <i>do not</i> count as net additions to the housing stock. They are part of the existing stock and must be discounted from the calculation of housing trajectory. If they are not discounted, the council runs the risk of having its core strategy declared unsound. We are strongly against the council including new non-self contained stock in housing target.	We recognise that vacant units do not contribute to additions to the housing stock but instead contribute to an increase in housing supply. As we are sure the HBF is aware, the targets for net additional homes in London were devised with reference to the 2004 London Housing Requirements Study and the 2004 London Housing Capacity Study both of which include an element for long term vacant units returning to use and for new non-self contained accommodation. Paragraph 3.12 of the London Plan provides more detail.
	4.6	Paragraph is unclear. Council must note that in accordance with law financial contributions can only be pooled to fund additional services/infrastructure made necessary by the	Suggest amendment to paragraph 4.6: Where additional housing creates a need for supporting facilities and infrastructure or action is required to mitigate the impacts of the development, the Council will negotiate planning obligations to secure contributions, either in kind or financial. In some case, financial contributions are 'pooled' to address the cumulative impacts of development within the locality. The following indicates some of the kinds of contributions that will be sought:

		development in the specified locality of the development, it cannot be done at a district level.	
	4.7	No evidence is presented to justify operating a windfall allowance. The council must work to identify sites to feed into its 5 yr Land Supply and its 15 Year housing trajectory.	The Council has identified a five year supply of housing sites to meet the target set out in the London Plan. It has also identified sufficient sites to meet the target in a 15 year housing trajectory. Windfall sites will form part of the 15 year housing as supported by the London Housing Capacity Study 2004.
	5	The overriding priority for the council should be to increase the overall number of homes built. Part of the solution will involve allowing homes to be built in those areas of the borough where market demand is strongest. Want to see the results of the London SHMA reflected in the document and core strategy.	The Housing SPD is based on the findings of the 2004 London Housing Requirements Study and the findings of the 2007 Haringey Housing Needs Assessment. The findings of the London SHMA, when published, will form part of the evidence base for the Core Strategy that is in production.
	5.9	What evidence does Haringey have to substantiate the claim that key workers have a greater need for bigger homes than non key workers? The most	The evidence from the 2007 Housing Needs Assessment indicates that a higher proportion of key worker households require 3+ bedroom properties than non-key worker households (Table 15.2, Pg 119 Key worker households and housing/household characteristics, Haringey Council Housing Needs Assessment (2007)). To address the unmet need for 3+ bedroom affordable housing within the borough, Haringey Council has taken the approach of

		equitable solution to the problem is increasing supply, not rationing housing. This policy should be deleted.	weighting the Affordable Housing Dwelling Mix towards 3+ bedroom properties. Table 7.3, Affordable Housing Dwelling Mix of the draft Housing SPD, 2008, gives greater detail.
	5.16	Unconvinced bringing empty homes back into circulation will prove a cost effective strategy. Will have only a marginal impact on meeting housing needs.	The Council is committed to ensuring that properties are not left empty in conformity with London Plan policy 3A.4, Efficient Use of Stock. The 2005-2008 Empty Property Strategy is in the process of being updated and this works on both bringing empty properties back into use and targeting long term vacant property. In addition the Council is also working with private landlords to ensure that selected people on the social housing register can access private rental properties through the Direct Letting Scheme and Haringey Homes Direct.
	5.33	Habitable rooms method of calculation is complex. Units method should be used instead. Using units will help with calculating other s106 obligations and assist in monitoring.	In line with current GLA guidance Haringey Council calculates the level of affordable housing in individual schemes based on the number of habitable rooms. A count of the number of affordable housing units will still be used to assess the level of provision across the borough.
	5.34-5.38	Welcome the consideration to be given to viability. Would like greater flexibility regarding negotiations of s106 obligations.	Further flexibilities regarding the negotiations of planning gain contributions may be investigated during the development of the Core Strategy.
	5.43-5.47	No justification for seeking a higher level of affordable housing off-site than would have been provided on-site, this must be a matter for	There may be exceptional planning circumstances where an off site provision would be preferable or cases where the off site provision would be of superior quality than that which could be provided on sites. Each case will, of course, be considered individually and the Council gives preference to on site provision in the interests of securing mixed tenure developments.

		negotiations between parties concerned. The developer is only obliged to provide the amount of housing that would have been provided on the original site. Paragraph should be revised accordingly. Also council needs to consider whether such a policy is feasible, whether it will consolidate division, and whether there are alternative locations.	No change.
	5.46-5.47	Developer is only required to make a cash payment to the council which is sufficient to provide the equivalent number of affordable homes that would have been built on site if they had been viable. Paragraph could be amended otherwise it could become a barrier to housing delivery.	There may be exceptional planning circumstances where an off site provision would be preferable or cases where the off site provision would be of superior quality than that which could be provided on sites. Each case will, of course, be considered individually and the Council gives preference to on site provision in the interests of securing mixed tenure developments. No change.
	6.13-6.14	Should be using Code for Sustainable Homes as is standard. Cannot insist	The standards quoted in paragraph 6.13 and 6.14 of the Housing SPD are necessary for homes funded through the National Affordable Housing Programme in 2006-08 and 2008-11. The standards do not relate to market

		upon Code level 3 for market dwellings in advance of the nationally agreed timetable. Cannot demand compliance with “Building for life” design criteria.	dwellings.
	7	Council should be commissioning a SHMA to ensure ‘robust and credible’ evidence basis for policies.	The GLA in partnership with London local authorities and with the agreement of the Secretary of State, have decided that the London region represents the most appropriate spatial level of analysis for understanding housing markets as well as enabling a co-ordinated approach to evidence base work and policy-making across the region. A single borough approach is unlikely to satisfy the needs of the SHMA. The North London Sub Region will produce an SHMA for the Sub Region which will form part of the evidence base in the production of the Core Strategy.
	7.3	Section should be amended by deleting any reference to the type, size and tenure of market housing. Which, in accordance with PPS3 Haringey cannot determine.	Paragraph 7.3 does not <i>require</i> a percentage mix of dwellings for market housing but <i>recommends</i> that a size mix is provided in line with the evidence of a mismatch between market supply and demand.
	8.1-8.4	Object to stipulation of minimum floor-space standards and any additional standards by local authorities. Increasing the size of homes could reduce the number of homes that would	Since the repeal of “Parker Morris” standards in 1980, Haringey council, in common with many other local authorities, has continued to adopt minimum space standards as part of the development plan for the local area. The standards indicated in the SPD are comparable to the ‘Parker Morris’ standards and represent the midpoint of the floorspace standards in ‘The Housing Quality Index’ measure. The need to provide a greater number of homes within the borough must be balanced with the need to ensure that homes are well designed with an appropriate amount of usable living space. To this end Haringey council

		<p>eventually be built. Also, keeping the price of these homes at affordable levels will be difficult. The 'larger unit' developer will always be outbid by the developer proposing a larger number of smaller units of accommodation. Land vendors will not be swayed by the SPD and will continue to hold out until they achieve the right price. Strongly advise against Haringey adopting this policy.</p>	<p>seeks to maintain both the overall dwelling size minima and floorspace minima for individual rooms in the proposed Housing SPD (see Table 4 – Haringey Council SPG 3a (2006) and Figure 8.1 – Haringey Council, Draft Housing SPD (2008)).</p> <p>The HBF may be interested to note that the Mayor of London is currently considering the reintroduction of 'Parker Morris' style standards within the capital as part of the Housing Design Guide first proposed in 2007.</p>
	8.28-8.31	<p>Lifetimes Homes compliance cannot be insisted upon by the council. Making providing lifts in 3 storey blocks mandatory is expensive and will impact on affordability for residents.</p>	<p>We refer the HBF to policy 3A.5, Housing Choice, in the London Plan (2008) which seeks to ensure that all new homes in London are built to Lifetime Homes Standards.</p>
Mario Petrou	SPD	<p>Seems Housing SPD will adopt UDP targets. Current UDP target of 680 affordable homes is insufficient. Tall buildings of mainly</p>	<p>The SPD must be in conformity with the UDP and London Plan targets. There is no formal evidence at present to support the adoption of higher targets. The London wide Strategic Housing Land Availability Assessment is currently under production and this may result in changes to the housing target for Haringey.</p> <p>Haringey council is committed to achieving mixed and balanced communities</p>

		affordable homes will be socially disastrous.	throughout the borough. There are real opportunities to make significant contributions to the provision of affordable housing within the borough. However, the need for affordable housing must be balanced with the need to ensure that communities are mixed and balanced. The number of affordable units sought will be at or above 50% of the total number of units in line with policy and the Council will endeavour to ensure that all developments comprise a mix of market, intermediate and socially rented accommodation where possible.
	SA	Population is higher and overcrowding worse than the SA is going to make allowances for. International plans, policies and programmes should be included in Appendix of SA.	An error on our part meant that the SA scoping report was sent out for consultation with the draft SPD. The SA has now been made available to consultees.