

**Haringey** Council

Agenda item

**[No.]**

**Planning Committee meeting**

**On 6<sup>th</sup> October 2008**

Report Title: **Housing Supplementary Planning Document - Adoption**

Forward Plan reference number (if applicable): **[add reference]**

Report of: **Ransford Stewart, Interim Assistant Director, Planning Policy and Development**

Wards(s) affected: **All**

Report for: **key decision**

### **1. Purpose**

1.1 Following public consultation that took place between the 17<sup>th</sup> April and the 29<sup>th</sup> May 2008 on the Draft Haringey Housing Supplementary Planning Document (SPD), and the document's subsequent amendment to reflect the views expressed during this consultation, this report seeks any final members' views on the SPD prior to its adoption as an SPD which will be as part of the Local Development Framework (LDF), subject to the agreement of the Cabinet on the 14<sup>th</sup> October 2008.

### **2. Recommendations**

2.1 That members note the work, including consultation, carried out on the proposed Haringey Housing Supplementary Planning Document, and the accompanying Sustainability Appraisal.

2.2 That the Committee recommends adoption of the above documents, subject to Cabinet approval on the 14<sup>th</sup> October 2008.

Report Authorised by: **Ransford Stewart, Interim Assistant Director**

Contact Officer: **Ciara Whelehan, Team Leader Planning Policy (ext 5516)**

### **3. Chief Financial Officer Comments**

3.1 There are no significant financial implications arising from the recommendations of this report. Costs in relation to consultation and other work carried out in relation to the Housing Supplementary Planning Document have been met from the PPD approved budget.

#### **4. Head of Legal Services Comments**

4.1 The Head of Legal Services has been consulted and comments that the proposed SPD consolidates existing policies. The SPD can only provide guidance on existing UDP policies and cannot introduce new policies. In addition, the tests of soundness contained within Planning Policy Statement 12 include the statutory procedural and conformity tests and the test of conformity with the London Plan is clearly an issue. In July the Mayor published a statement that an alteration will be made to the London Plan granting greater discretion to Local Planning Authorities for the amount of affordable housing in Borough planning documents and development schemes. In addition, if the outcome of Consultation on the Core Strategy Options gives rise to changes from the existing policy frameworks that will entail a separate exercise as the Core Strategy will take precedence. The Core Strategy process can be used to further develop affordable housing policy options.

#### **5. Local Government (Access to Information) Act 1985**

5.1 Background documents include:

- Haringey Unitary Development Plan, 2006
- The London Plan, 2008 (Consolidated with Alterations since 2004)
- The London Plan Supplementary Planning Guidance – Housing, 2005
- Planning Policy Statement 3 - Housing (PPS) 2006
- Haringey Housing Strategy 2003 – 2008
- Haringey Housing Needs Assessment, 2007.

#### **6. Strategic Implications**

6.1 The SPD covers the whole of the borough as it deals with all housing issues for the Haringey community in terms of ensuring an adequate standard and range of housing, especially affordable and accessible housing in order to meet current and future needs of the borough.

#### **7. Financial Implications**

7.1 The costs associated with the formulation and the adoption of the Housing SPD will need to be contained within the approved budget.

#### **8. Legal Implications**

8.1 These have been commented on in paragraph 4.1.

## **9. Equalities Implications**

9.1 The proposed SPD set out in this report will be used to provide benefits for the Haringey community in terms of ensuring an adequate standard and range of housing, especially affordable and accessible housing in order to meet current and future needs of the borough.

## **10. Background**

10.1 As part of the Unitary Development Plan (UDP) Inquiry (held between April and September 2005) the Inspector drew attention to the absence of any clear housing target in the UDP. This meant it was very difficult for the objectors or the Council to assess whether Haringey could accommodate its required amount of housing. An evitable part of the housing provision issue was density. Objectors were concerned that density would be unduly high in order to meet housing provision targets. The Inspector's conclusions on these matters were that first Haringey should set a housing target in the UDP and that second; all density figures should be justified. The housing target was included in the UDP.

10.2 The UDP was adopted on 17 July 2006. Following the Full Council meeting and taking on board the Inspector's issue on density, the Council is committed to clarify the housing policies of the UDP, in particular the housing density policy. It was agreed, that before a full review of the UDP policies, through the Core Strategy process and the new planning system, a Supplementary Planning Document would be the most appropriate way to provide clarity to existing UDP housing policies.

A member / officer steering group was established to oversee the production of the Housing SPD. Terms of Reference were agreed at the first meeting in April 2007. Monthly meetings of the group commenced in June 2007 and continued until December 2007 when the final draft of the SPD was agreed.

The SPD will form part of the Council's LDF and will provide guidance to supplement the housing policies of the adopted UDP and the future Core Strategy. The SPD is based on the following UDP objectives:

- To maximise new housing opportunities
- To ensure that an adequate standard and range of housing, especially affordable and accessible housing in order to meet the current and future needs in the borough
- To help create mixed and balanced communities.

## **11. Planning Context**

11.1 The SPD has been prepared in accordance with national planning guidance and the policies in the Mayor of London's spatial development strategy, the London Plan. It

replaces existing Supplementary Planning Guidance (SPG) on housing standards (SPG3a), privacy, sunlight and daylight (SPG3b) and affordable housing (SPG10b).

The SPD is intended for use in the determination of planning applications for housing development or for mixed use proposals involving housing. It provides detailed guidance on standards for new housing and conversions, on affordable housing provision and on housing density and design. It must be recognised that the SPD can only provide guidance on the existing UDP policies – it does not contain new policy. The Council is currently consulting on policy issues and options for a Core Strategy which will replace the UDP in 2010. These two processes are separate.

The SPD is supported by a Sustainability Appraisal (SA) to ensure that the document contributes to achievements of sustainability objectives. This is in line with the provisions of the Planning and Compulsory Purchase Act 2004 which makes an SA mandatory for SPDs. A scoping report was prepared and released for consultation in April 2008. From the Scoping Report a Sustainability Appraisal was produced and this went out on further consultation in August 2008. The sustainability appraisal process seeks to predict the social, economic and environmental effects of the SPD. A sustainability appraisal report accompanies the draft SPD and concludes that overall the document has a positive effect on most identified objectives. The report, attached as Appendix 3 of this report, puts forward recommendations to improve the sustainability performance of the document. These recommendations have been reflected in the SPD.

## 11.2 Housing Supplementary Planning Document

The SPD will replace the following Supplementary Planning Guidance:

- SPG3a 'Density, Dwelling Mix, Floorspace Minima, Conversions, Extensions and Lifetime Homes'.
- SPG3b 'Privacy/overlooking, aspect/outlook, daylight/sunlight
- SPG10b Affordable Housing.

It will also give local interpretation to the Mayor of London's London Plan Supplementary Planning Guidance on housing.

The SPD provides guidance on the implementation of the following Unitary Development Plan housing policies. The SPD also refers to three urban design policies.

Policy G2:	Development and Urban Design – development should be of high quality design and contribute to the character of the local environment
Policy G3:	Housing Supply – providing sources of new housing to meet a borough target of 680 additional homes per annum
Policy UD2:	Sustainable Design and Construction – ensuring design that maximises the potential of the site without causing any unnecessary local nor global consequences

Policy UD3:	General Principles – encouraging design that responds positively to its context and that is accessible.
Policy UD4:	Quality Design – Development should positively address detailed and interrelated elements of design
Policy HSG1:	New Housing Developments – ensuring an adequate standard, quality and range of housing across the borough
Policy HSG2:	Change of Use to Residential – encouraging changes of use to housing, but ensuring no loss of viable employment, retail, or open space
Policy HSG3:	Protecting Existing Housing
Policy HSG4:	Housing developments capable of providing 10 or more units will be required to include a proportion of affordable housing to meet an overall borough target of 50%
Policy HSG5:	Hostel Accommodation – criteria controlling the provision of new hostel provision
Policy HSG6:	Houses in Multiple Occupation (HMOs) – restricting conversions into HMOs and encouraging conversion of sub-standard HMOs back into single family dwellings
Policy HSG7:	Housing for Special Needs – encouraging supported housing schemes
Policy HSG8:	Gypsies and Travellers – criteria restricting proposals for new sites
Policy HSG9:	Density Standards – applies a general density range of 200-700 habitable rooms per hectare to new residential developments and using a ‘design-led’ approach to density, including site character.
Policy HSG10:	Dwelling Mix – ensuring a mix of dwelling types and sizes
Policy HSG11:	Restricted Conversion Areas – restricting conversion of single dwellings into flats in specified areas and in streets which already a concentration of converted properties.

11.3 The structure of the SPD follows the housing chapter of the UDP and is made up of the following sections:

- Housing Supply in Haringey
- Affordable Housing
- Density and Design

### **Housing Supply in Haringey**

This section looks at the overall supply of housing in Haringey and where this supply comes from. It provides guidance on policies G3, HSG1, HSG2, HSG3. Housing capacity in the borough is illustrated along with reference to PPS3 requirements in terms of identifying a five year supply of housing sites. Further guidance on HMOs and Restricted Conversion Areas and how to calculate the existing proportion of conversions and / or HMOs is provided.

### **Affordable Housing**

This section provides further guidance on how to implement policy HSG4. It provides a summary of the housing need in Haringey and how the supply of affordable housing is imperative to meet the priority need. It deals with issues such as affordable housing type, negotiation of affordable housing, on and off site provision.

### **Density and Design**

Further guidance on policies HSG8 and HSG9 are set out in this section. It provides detail on issues such as calculating density, density standards and what the Council expects from all developments, design requirements for affordable housing, as well as dwelling mix for both affordable and private market housing.

## **12. Consultation**

- 12.1 The Draft Housing SPD was, along with an accompanying sustainability scoping report, issued for formal public consultation for a period of 6 weeks from the 17<sup>th</sup> April to the 29<sup>th</sup> May 2008. A Schedule of Responses to the consultation is attached at Appendix 1. A total of 14 written responses were received from individuals or organisations.
- 12.2 Overall the SPD was welcomed; however, the main area of concern was from the GLA relating to affordable housing. The proposal for a 50:50 housing tenure split between social rented and intermediate affordable housing provision as a starting point set out in the consultation draft of the proposed SPD is not accepted by the GLA. They have advised that it is not in general conformity with the London Plan which states that boroughs should take account of the London-wide 70:30 housing tenure split for social rented housing and intermediate housing provision in setting borough housing targets.
- 12.3 To bring the SPD into conformity with the London Plan (2008) the draft SPD will need to reflect the target split of 70% socially rented and 30% intermediate affordable housing.
- 12.4 It is recommended that Haringey accept the GLA's objection and revert to the 70:30 housing tenure split to ensure the SPD is in conformity with the London Plan. Any policy variations from a 70:30 housing tenure split needs to be locally justified and supported by a strong evidence base. Further as advised by the Head of Legal Services, the SPD can only provide guidance on the application of existing policies and cannot be used to introduce new policy. It is through the Core Strategy process that Haringey can introduce a 50:50 tenure split which will reflect local circumstances as well as being justified by robust housing evidence.
- 12.5 Following public consultation on the draft Sustainability Appraisal of the Housing SPD in August 2008, the draft SPD has been amended, where appropriate, to reflect representations made, including those made by the GLA. It is recommended that the SPD is taken to the Cabinet in October for approval.

### **13. Conclusion**

- 13.1 The Housing SPD will form part of the Council's Local Development Framework. It will provide guidance on the existing UDP policies and will be a material consideration when considering and determining planning applications. The SPD will replace existing SPG on housing standards, density & design and affordable housing.

The SPD has been prepared in accordance with national planning guidance and the policies in the Mayor of London's spatial development strategy. In line with the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal has been prepared to accompany this draft SPD to ensure that the document contributes to the achievements of sustainability objectives.

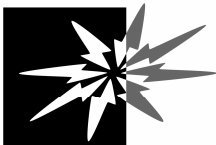
The draft SPD is included at Appendix 2 of this report and the Sustainability Appraisal at Appendix 3.

### **14 Use of Appendices / Tables / Photographs**

Appendix 1 – Schedule of Consultation Responses

Appendix 2 – Housing SPD

Appendix 3 – Sustainability Appraisal Report for Housing SPD



Haringey Council

**Appendix 1 - Schedule of Consultation Responses**

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 instance and then the London Plan (2008).	Noted. Amendment will be made.
	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>	Noted. Reference to policies 3A.7, 3A.6 and 3A.11 will be made.



Name	Paragraph Referred to	Summary of Comments	Response
		4B.1 'Design principles for a compact city' 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.	
	4.1	a) Welcome reference to Haringey's annualised housing target but 10 year target should also be mentioned. b) The London Plan AMR (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.	a – suggested amendment to paragraph 4.1  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.  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	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.

Name	Paragraph Referred to	Summary of Comments	Response
		not take into account cumulative impacts of smaller schemes in the way that education contributions do. This should be considered.	
	5.1	Definition for affordable housing should be in line with London Plan policy 3A.8. Introduction to the varieties of affordable housing types would be useful.	<p>Amend paragraph. 5.1 below UDP definition:</p> <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	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.

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		assessment. 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 affordable housing. Policy 3A.9 of the London Plan states that 50% of housing provision should be affordable. This should be based on the	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.

Name	Paragraph Referred to	Summary of Comments	Response
		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 criteria for this in the Mayor's Housing SPG which should also be reflected in the SPD.	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.
	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.

Name	Paragraph Referred to	Summary of Comments	Response
	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 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.	Haringey's Housing Needs Assessment does indicate the need to provide a higher level of 3+ bedroom accommodation in the social rented sector.
	8.13	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'	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.

Name	Paragraph Referred to	Summary of Comments	Response
		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.	
HFRA	Section 1 – Affordable Housing	<p>a) Affordable &amp; 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 &amp; 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</p>

Name	Paragraph Referred to	Summary of Comments	Response
			<p>may find it difficult to obtain and/or service mortgages.</p> <p>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.</p>
	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% b) Intermediate – 30% (to meet targets for affordable component of additional homes)	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.
	5.33	Add text - ...affordable	Please see response to 5.18 above.

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		housing will <i>also</i> be calculated by habitable rooms <i>as well as</i> by units.	
	5.43	Add text - ...there may be <i>exceptional</i> 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	<ul style="list-style-type: none"> <li>a) Scale, character and density of housing development is untested, risky and controversial, and in urgent need of appraisal and amendment.</li> <li>b) Current infrastructure is inadequate to deal with current population levels, let alone greater and denser population levels.</li> <li>c) Amenities/facilities that help create sustainable communities are inadequate for current, let alone denser population levels.</li> <li>d) Policies promoting highly intensive residential development are at odds with policies promoting sustainable communities.</li> </ul>	<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> <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	Table 3.A2 of the London Plan...should read 'Table <u>4.1B</u> '	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



Name	Paragraph Referred to	Summary of Comments	Response
			the document.
	6.1	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>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>Add text (replace with) –</p> <p><u><i>These density ranges are for guidance and the achievement of high quality design is of equal importance.</i></u></p> <p>(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>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 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	‘Habitable rooms’ needs defining. Make clear definition in Para 7.9 applies to earlier chapters. Existing SPG3a page 2 paras A1 and A2 are	<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>

Name	Paragraph Referred to	Summary of Comments	Response
		<p>better. Why has a subdivisible large room decreased from 20m<sup>2</sup> in the SPPG to 18.5m<sup>2</sup> 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 20m<sup>2</sup>.</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>
	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>

Name	Paragraph Referred to	Summary of Comments	Response
	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.' There is no such table.	<p>Amend Para 7.4 – However, table 7.2, below, identifies that the requirement....</p> <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 –</p>

Name	Paragraph Referred to	Summary of Comments	Response
			<p>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	<p>a) Becoming a ‘design-led borough’ would require improving and revising existing and proposed standards.</p> <p>b) Clear standards for every developments impact on and contribution to the street scene are required.</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.
	8.1	Reference to a Table 6, there is no such table.	<p>Amendment to paragraph 8:</p> <p>...will normally be required to conform to the minimum space standards shown in Figure 8.1.</p>
	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 a <i>fully equipped play space</i> should be provided.
	8.27	Para B1 pg 4 of SPG3	Suggested amendments to text:

Name	Paragraph Referred to	Summary of Comments	Response
		provides better protection for light conditions and should be restored.	<p>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.</p> <p>8.26 New development will be assessed to ensure that the building layout maintains acceptable levels of daylight and sunlight to appropriate existing windows ...</p> <p>8.27. Delete</p>
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)	Support noted.

Name	Paragraph Referred to	Summary of Comments	Response
		greater flexibility.	
	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 units as houses instead of flats is too prescriptive. Provision of 3 and 4 bedroom houses would significantly reduce the	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.

Name	Paragraph Referred to	Summary of Comments	Response
		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 Greenwo od – Circle Anglia	5.3	Nominations should be in accordance with the North London sub-region nominations agreement for the rented homes.	The North London Sub-Region Nominations Agreement is a mechanism whereby participating local authorities can share nominated units within the sub-region. 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.

Name	Paragraph Referred to	Summary of Comments	Response
	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 justify this policy.	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.
	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>



Name	Paragraph Referred to	Summary of Comments	Response
			<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	<p>Pepper Potting introduces legal complexity. If there are rented homes in a predominantly private or shared ownership 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.</p>	<p>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 within developments enables RSLs to manage properties effectively.</p>
	7.1	<p>Support the statement and policy approach.</p>	<p>Support noted.</p>
	7.5	<p>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</p>	<p>See comment in relation to paragraph 5.32 above.</p> <p>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.</p> <p>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.</p>

Name	Paragraph Referred to	Summary of Comments	Response
		requirement would adversely impact on supply.	
	8.1	Propose the use of HQI minimum space standards, not the mid-point of HQI 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 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 we have no specific comment.	No comment.
British Waterwa		Request the Housing SPD emphasises the role of	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

Name	Paragraph Referred to	Summary of Comments	Response
ys London		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 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 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.	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.
	6.6	Unclear as to meaning of this paragraph. May need to be rewritten so that it is easier to	Density calculations can be very complex. We have included the density calculation methodology within the SPD to provide transparency.

Name	Paragraph Referred to	Summary of Comments	Response
		interpret.	
	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.	<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>
	5.29 & 5.31	In general supports the paragraphs but does not believe the intention of these particular paragraphs is easy to understand. 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 5.30.</p> <p>...Conversely, households renting housing from the Council or an RSL are concentrated in the east of the borough. <i>Remove final sentence.</i></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>
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.

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	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 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.	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 widely applicable to the types of application made in Haringey and are therefore referred to specifically in the SPD.
	8.14	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.	Extensions and conversions in Conservation Areas are guided by the advice contained in Section C of SPG 2 Conservation and Archaeology.

Name	Paragraph Referred to	Summary of Comments	Response
	Sustainability Appraisal Scoping Report	Serious concerns about the clarity and effectiveness of information. Not made clear what the relationship is between the SA and DPD.	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.
	SA Table 2.1.1	Should include information that pertains to the sustainable achievement of the Housing SPD's objectives.	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.
	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 in planning obligations. As does	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

Name	Paragraph Referred to	Summary of Comments	Response
		Policy 3A.17 and 3A.26 of the London Plan which recognise 'policing facilities' as social infrastructure and strategic community related issues.	<p>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 regeneration plans if there is insufficient market demand from people to live in areas such as Tottenham Hale and Haringey Heartlands.	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.
	Table 1	Vacant units <i>do not</i> count as net additions to the housing	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,

Name	Paragraph Referred to	Summary of Comments	Response
		<p>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.</p>	<p>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.</p>
	4.6	<p>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 development in the specified locality of the development, it cannot be done at a district level.</p>	<p>Suggest amendment to paragraph 4.6:</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>
	4.7	<p>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.</p>	<p>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.</p>
	5	<p>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</p>	<p>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.</p>



Name	Paragraph Referred to	Summary of Comments	Response
		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.	
	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 equitable solution to the problem is increasing supply, not rationing housing. This policy should be deleted.	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 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	Further flexibilities regarding the negotiations of planning gain contributions may be investigated during the development of the Core Strategy.

Name	Paragraph Referred to	Summary of Comments	Response
		obligations.	
	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 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.	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.
	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 upon Code level 3 for market	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 dwellings.

Name	Paragraph Referred to	Summary of Comments	Response
		dwellings in advance of the nationally agreed timetable. Cannot demand compliance with “Building for life” design criteria.	
	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 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	<p>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 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</p>

Name	Paragraph Referred to	Summary of Comments	Response
		<p>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>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 affordable homes will be socially disastrous.</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 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.</p>
Cllr Bevan John	5.30	<p>Add text – Conversely, households renting housing from the council or a RSL are <u>clearly</u> concentrated... Add text (at end of paragraph) – <u>Economic regeneration in</u></p>	<p>Whilst this is a reasonable statement to make it does little to add to the <i>housing</i> thrust of the SPD. However, suggest amendment to Para 5.30:</p> <p>Conversely, households renting housing from the Council or an RSL are concentrated in the east of the borough. <i>Remove final sentence.</i></p>

Name	Paragraph Referred to	Summary of Comments	Response
		<u><i>the east will continue to be difficult if this concentration is not eased/addressed as an issue.</i></u>	
	5.31	Edit text – Based on this assessment 100% social rented affordable schemes in the borough <u>will not</u> be acceptable in certain circumstances. Especially	Para 5.31 will be clarified to support ward assessments.  Suggest amendment para 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
	6.4	The reference to this should be strengthened, it should refer specifically to the 20 issues raised in the CABE document – ‘Building for life: Delivering Great Places to Live.’ Should use this document and its future revisions when working up future development proposals.	All three guides referred to in the draft SPD, Para 6.5, have particular relevance to design issues. There may be scope to adopt the CABE key issues through the local development process but there is no sanction for this within the existing UDP
Cllr Vanier Bernice	5.31 & 5.32	A housing split of 70% social and 30% private housing west of the borough and the reverse, 70% private and 30% social housing east of the borough would go a long way towards creation socio-economic balance in relation to housing.	The overall target for 50% social housing across the borough is in accordance the London Plan. There may be scope to address the polarisation apparent in Haringey in the manner suggested. The impacts and mechanisms to achieve this would need to be explored through the Local Development Framework process.