

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation 8th January – 4th March 2016

The Council is consulting on four Development Plan Documents (DPDs).
These are the:

- Alterations to the Strategic Policies;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the Word compatible version of this form which is available for **downloading from the Council's website** www.haringey.gov.uk/localplan.

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they **should only relate to the 'tests of soundness' and legal compliance** (see guidance note at the back of this form, in the DPDs appendices and on our website for more information).

Complete the form overleaf and return to:

Local Plan team
Level 6, River Park
House,
Wood Green
London
N22 8HQ

Or by email to:

ldf@haringey.gov.uk

Or complete it online at:


www.haringey.gov.uk/localplan

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4th March 2016**.

Next Steps

In the summer of 2016 the Planning Inspector will hold an "Examination in Public" to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

For further information please visit www.haringey.gov.uk/localplan or email ldf@haringey.gov.uk

Ref: (for official use only)	Local Plan Publication Stage Response Form	
-------------------------------------	--	--

Name of the DPD to which this representation relates:

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

	1. Personal Details ¹	2. Agent's Details
Title	Ms	
First Name	Anne	
Last Name	Gray	
Job Title (where relevant)		
Organisation (where relevant)	Writing in individual capacity	
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
Email address		

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy	Policies Map
Alterations to Strategic Policies paras 1.3.1, 1.4.10, 1.5 2.1, 3.2	Strategic housing policy	

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	No view Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.(2) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> No it's not
4.(3) Complies with the Duty to co-operate	No view Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

I believe that the plan is unsound on grounds of :-

- 1) it is not **the most appropriate strategy when considered against the alternatives**
- 2) therefore it is not effective

I have issues about:-

- a) the low amount of affordable housing, the target should be re-set at least 50%
- b) the excessive reliance on a small number of powerful large private developers to get housing built,
- c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes
- d) the absence of attention to energy saving and local power generation

Please see attached text at the end of the form as there is not room for all my comments in this box.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Some alternative suggestions are set out in the attached text.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

yes Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

I should like to have the opportunity to enlarge on the ideas I have expressed in this document, in constructive dialogue with the Inspector.

Although I write as an individual, I bring to this exercise many years of relevant professional involvement as a consultant on local economic development, as former leader of Tottenham Task Force (1993-5), as former member of the research team in Haringey's housing department (1975-8), and as a local activist on regeneration and sustainability issues (for about the last decade). I have been resident at my current address for 32 years and also lived in Tottenham from 1975-8.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature	(By e-mail) Anne M. Gray (postal form to follow)	Date:	3.3.16
--------------	--	-------	--------

Attached/additional text begins here: -

a) The low amount of affordable housing

Under SP2, the target should be re-set at least 50%, given that the strategic housing market assessment says that 58% of the local population cannot afford a rent as high as 80% of market levels and given the plan's own admission in para 1.3.1 that 59% of total net additional homes need to be 'affordable'. Otherwise a lot of current residents will have to move further away from central London, with consequent difficulties for their employment and a higher demand on transport facilities as their jobs will not necessarily move with them.

b) The excessive reliance on a small number of powerful large private developers to get housing built

The plan needs to be considered alongside the Council's adopted policy of working with Spurs as a major player, and its adopted proposal to set up a single joint venture company with 50% developer equity (and control) to which many sites in Wood Green and Northumberland Park will be transferred. This gives enormous bargaining power to these two private interests. Spurs have already negotiated away much of their s.106 contribution to the redevelopment of the football ground area and have been given planning permission for two huge towers with no 'affordable' housing. There are huge risks attached to dependence on the market destiny of a handful of companies.

The Council should be seeking to sub-divide sites to facilitate development proposals from smaller builders and from community led organisations (such as housing coops, community

land trusts, or development trusts). It has 15 years to facilitate the development of the latter category, of which at least 3 already exist in Haringey.

I am agnostic as to where would be the best place in the 'strategic policies' document to say this, but something is needed along the lines of:-

'The Council will seek to diversify its array of development partners by encouraging community led development organisations such as housing coops and non-profit trusts to come forward, request sites and discuss proposals, and where appropriate will help them with formulation of proposals and searches for sources of finance pre-planning-application. It will also encourage smaller London-based building companies to put forward proposals for just part of a site defined in the Site Allocation Documents where this is likely to produce value for money and speedy use of the available land.'

The Council will not tolerate land being left undeveloped for more than xx months (xx = 10?) following the grant of planning permission. Once a s.106 contribution has been agreed, planning permission may be revoked if this agreement is not adhered to and appropriate funds must be placed in an escrow account before building regulations approval can be finalised.

The Council may require as a condition of planning permission that units should not be offered for sale **'off plan' except to RSLs or organisations offering to 'sell on' for shared ownership'**.

This last provision is to avoid off-plan sales which favour cash buyers, often foreign companies, at the expense of local owner occupiers. **It would mean facilitating a 'bridging loan' arrangement by shared ownership providers so that someone who cannot get a mortgage until the building is completed can obtain a shared ownership deal to start off with and then buy out the rented share as soon as s/he can obtain a mortgage, maybe within months.**

Following the example of Islington Council, **steps need to be taken against the 'buy to leave' practice.** Therefore somewhere the policies should say something like:-

'New homes should be occupied by a resident within 3 months of completion, otherwise the Council reserves the right, as a condition of planning permission, to nominate a suitable occupant or to require letting to a registered social landlord. Evidence of genuine residential occupancy, such as the name and workplace of the occupant, and records of use of electricity and water, may be required in cases of doubt.'

Also in question should be use of new homes for 'air b and b' type lettings. Where permission is granted for a residential development, it should be considered a breach of that permission if hotel-type use, with more than say 8 different occupants in a year in the same dwelling, is subsequently discovered.

c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes

The plan is focussed on meeting the new homes target by building on large sites, often to excessive height especially around Tottenham Hale. Spontaneous action to expand the existing housing stock upwards or sideways is neglected unless it is envisaged in a brief mention of **'windfall sites'** in para. 3.2. **But expanding and making better use of existing buildings has considerable potential, for example by:-**

1) reducing the void rate of the housing stock. In particular this could be done by reducing turnover of private tenants. Typically private landlords are now letting for as little as 6 months at a time. When they do so the property may well be left empty for a week between lettings, so that extending the length of tenancy from 6 to 12 months would reduce the average void % of a number of private-rental dwellings at

any one time from 1/26 to 1/52, that is from approximately 4% to approximately 2%. The Council should set up a low-profit municipal lettings agency to offer 12 month tenancies, setting a model and a competitive force in the market which would reduce the void rate and improve tenants' security. This could be included as an additional strategic policy, worded something like:-

'The Council will seek to reduce the turnover in private lettings by working with landlords to achieve longer tenancies and thus reducing the proportion of properties empty at any one time due to tenant changeover, possibly by acting as intermediary between tenants and landlords to offer tenancies of 12 months or more '.

2) encouraging owners and business tenants to make better use of flats above shops, which are often merely used for storage and in poor repair. For example, a policy could be:-

'The Council will conduct surveys every 2-3 years of town centre and minor shopping parades to identify unused or under-used accommodation above shops and offices which could be brought or returned into residential use. It will work with owners to effect such re-use, through project-managing re-use, helping to identify contractors and suitable finance, finding tenants, and guaranteeing rents where appropriate. In some instances such premises could be made available to homeless families. '

3) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. Owners could be encouraged by offering council tax concessions (no re-banding of the enlarged building for x years, or extension of the single-occupancy council tax concession for 1 or 2 years for a lone-dwelling owner who creates one or two habitable rooms for persons living with them as relatives or as lodgers in a family environment. This is not to encourage HMOs but rather for families to accommodate a young person who might otherwise have to move away (but often cannot now afford to) or to take in an aged parent, or a student or young migrant worker as a lodger. Many first floor flats (for example in my own street, Sirdar Road, N22) could be enlarged to accommodate a family with children, rather than just a couple, by addition of an attic conversion room.

4) following the lead of Zac Goldsmith's recent statement (<http://www.standard.co.uk/news/mayor/zac-goldsmith-add-two-storeys-on-public-buildings-to-help-solve-london-housing-crisis-a3189821.html>) , a large number of small sites for additional dwellings could be obtained by:-

- building an extra floor or two on top of single storey shops or other commercial premises

- building over small car parks so that parking remains underneath residential buildings but is not the only use of the site

- adding extra floors to public buildings

- adding extra wings to existing blocks of flats, especially in the more spacious west of the borough and on medium-rise council estates some of which have ample land space around the blocks. Wherever there is a blank wall or a staircase at the end of a building, such additions might be possible.

The plan could say:-

'The Council will undertake a survey of potential small sites for housing development consisting of addition of extra floors or wings to existing buildings, whether commercial or residential, or building on stilts over car parks, with a target of xx (=100 per year ?) units to be built in these ways across the borough, and encourage existing

owners or community-led development organisations to make use of the sites identified with a view to providing social rented accommodation.'

Further potential for freeing up accommodation for people who really want to live in Haringey could be obtained by offering older people who want to move out of London, especially owner occupiers who are under-occupying 3 or 4 bedroom homes, logistic help to move. I have written a further paper on this topic which can be supplied if it is of interest.

d) the absence of attention to energy saving and local power generation:-

The strategic policies are surprisingly silent on these issues, particularly given Haringey's recent attention to a 'green borough' strategy.

They should include something along the lines of:-

' All developments over xx units should be expected to make a contribution to reducing carbon emissions and averting fuel poverty, by such features as: solar panels, recycling of grey water or rainwater, thermally effective district heating systems, lighting in stairs and passages controlled by movement sensors.