



Planning Policy and Development
London Borough of Haringey
River Park House
6th floor
Wood Green
London
N22 8HQ

26 March 2015

Dear Sir/Madam

**HARINGEY LOCAL PLAN CONSULTATION: ALTERATIONS TO
STRATEGIC POLICIES 2011 – 2026**

DEVELOPMENT MANAGEMENT POLICES PREFERRED OPTION

Thank you for consulting with the Home Builders Federation (HBF) on the draft Haringey Local Plan and the Development Management Policies Preferred Option.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following representations and we would welcome, in due course, participating in hearings of the Examination in Public.

HARINGEY LOCAL PLAN CONSULTATION: ALTERATIONS TO STRATEGIC POLICIES 2011 – 2026

Alt6

We welcome very much the effort made by the Council to update its Local Plan to reflect the policies and requirements of the London Plan particularly the new housing requirements identified in the *Further Alterations to the London Plan* (FALP). A new revised and consolidated London Plan that reflects the FALP was adopted in March 2015. The London Plan provides the spatial strategy for the 32 boroughs, the City of London and the London Legacy Development Corporation. Borough plans need to be prepared so that they are in conformity with the London Plan.

We welcome the revision to the Local Plan to reflect the new housing requirement for Haringey of 1,502 dwellings per annum (dpa). We assume that the plan period will be 2011-2036. It would be helpful if the revised plan made this very clear.

Alt27

It is unclear what time-frame is being used that would generate a total strategic housing requirement for 19,800 dwellings. If the plan is intended to operate over the 15 year period 2011-2026 that would result in an overall strategic housing requirement for 22,530 dwellings (i.e. 1,502 x 15). Does this figure represent a residual figure once completions achieved since 2011 have been deducted? This should be clearly explained to avoid any doubt.

If the Council does not intend to back-date the new strategic housing requirement to the base year of 2011, the Council may wish to consider aligning its plan with the London Plan and prepare a plan that will operate over the ten year period 2015-2025.

Alt54

Some clarification is required here. The new London Plan has identified its *objectively assessed need* to be at least 49,000 dwellings per annum for the period 2015-2025 (equivalent to 49,000 per annum), but the figure of 49,000 is only the OAN if output is sustained at this rate until 2036. Over the shorter time-frame of 2015 to 2025 the OAN rises to 62,000 dpa.

The London Plan has established a capacity-constrained *strategic housing requirement* for 420,000 dwellings for the period 2015-2025 as set out in Table 3.1 of the London Plan. This is equivalent to 42,000 per annum. This is explained in paragraph 3.16b of the London Plan.

Haringey's contribution to meeting London's strategic housing requirement is to provide an annual average of 1,500 dwellings. We have rounded down the precise figures in all cases.

It is therefore not strictly accurate to say that the London Plan has set a target for 490,000 dwellings for the period 2015-2025. It has only set a London-wide target for 42,000 dpa.

It is acknowledged by the Mayor that in order to close the gap between the housing requirement and the objectively assessed need of 49,000 dpa for the period 2015-2036 the London Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets set out in table 3.1 (see London Plan Policy 3.3 Increasing Housing Supply).

Alt55

The plan states that the OAN for Haringey is 13,450 but the text does not state over what time-frame this is for. We assume this to be ten years because footnote 1 states that the OAN is 1,345 new homes per annum. Footnote 1 also states that the OAN is 20,172 net new homes for the period 2015/16 to 2030/31. This is understandable because the Council is preparing a fifteen year plan. We recommend that the reference to the ten year figure of 13,450 is removed to avoid confusion.

We have not considered the Council's SHMA but we recognise that the London SHMA produced by the Mayor to support the FALP makes some assumptions about inward and outward migration for London that result in a household projection that diverges quite significantly from the ONS and DCLG population and household projections. This is the Mayor's Central Variant which is explained in paragraph 1.10C of the London Plan. These assumptions were accepted by the inspector examining the London Plan as reasonable but he has recommended that the Mayor begins to review his plan in 2016 given the uncertainties associated with these migration assumptions and the implications that this will have for the duty to cooperate (i.e. whether the Mayor's assumptions relating to migration are being reflected in the plans being prepared by the authorities of the Greater South East). See paragraphs 8 and 30 of the inspector's report.

Alt62

We should flag-up at this juncture that the Council should have regard to the Government's *Housing Standards Review* and the recently published accompanying Written Ministerial Statement (published 25 March 2015). If the Council is proposing to introduce standards that exceed the new national Building Regulations it will need to ensure that it has met the requirements set out in the *Housing Standards Review: Technical Consultation*, DCLG September 2014. Any other construction standards will not be permitted. The Council will be aware that the Mayor is also required to take the provisions of the Government's Housing Standards Review into account and he is preparing additional alterations to the London Plan to take this into account (see paragraph 0.16H of the London Plan). The Council should monitor these developments. It may need to re-test the applicability of these London Plan policies (i.e. the tests relating to the justification/viability/affordability for the optional water and space standards) in the context of Haringey and what

effect the application of these London Plan policies may have for the delivery of housing.

Alt61

We note the amendment. The new national policy actually allows schemes of 10 and fewer dwellings to be exempted from affordable housing obligations. The text should be re-worded to read “with the capacity to provide 11 or more...”

We also draw attention to the Written Ministerial Statement dated 25 March 2015 exempting schemes of 10 units and fewer from the allowable solutions element of zero carbon homes. The Council may need to reflect this in the relevant policy.

Alt62

Maybe the Council should to refer to its Viability Assessment of 2015 here rather than the more dated 2010 assessment.

Appendix A

Policy SP2: Housing

Density and Design standards to deliver high quality homes

We strongly recommend that the Council gives consideration to the Government’s *Housing Standards Review* and has regard to the outcome of the examination of the Mayor’s alteration to the London Plan in the autumn.

It is not yet clear that the Mayor of London or the Council will be able to stipulate external space standards as these are not covered by the revised Building Regulations.

The Council will not be able to stipulate compliance with the Lifetime Homes Standard as this is one of the standards to be deleted by the *Housing Standards Review*. A standard that is comparable to Lifetime Homes is to be included in the new optional internal space standard that may be adopted by local authorities but subject to them satisfying the four necessary tests. The Council will need to reconsider this policy in developing its new local plan.

DEVELOPMENT MANAGEMENT POLICIES

Policy DM4: Public Art

To reflect the advice in the PPG the Council should not seek contributions to public art (ID: 23b-004).

Policy DM18: Housing Design and Quality

As stated above the Council will need to monitor developments with regard to the alternations to the London Plan. The Council may have to consider whether the Mayor's internal space standards are applicable in Haringey after considering the necessary tests.

It is uncertain whether the Mayor or the Council will be allowed to adopt external space standards. The *Housing Standards Review* does not allow any other standards other than those covered by the Building Regulations and the optional standards for internal space and water.

Policy DM19: Affordable Housing

As we have commented above, this policy will need to be amended in line with national policy.

Policy DM28: Allowable Solutions

The local policy for allowable solutions does not conform to national policy. National policy as set out in the report entitled *Next Steps to Zero Carbon Homes – Allowable Solutions* (DCLG, July 2014) allows house builders four routes to achieve allowable solutions. It clarifies that these routes are not mutually exclusive and a house builder may want to mix and match, depending on their circumstances. The four routes set out in paragraph 8 are (and we quote):

“i) the house builder could do more or all carbon abatement on site or through connected measures (e.g. a heat network);

ii) the house builder could meet the remaining carbon abatement requirements themselves through their own off-site carbon abatement action (e.g. retrofitting existing buildings);

iii) the house builder could contract with a third party to deliver the carbon abatement measures sufficient to meet the house builder's zero carbon obligation;

iv) the house builder could make a payment into a fund which then invests in carbon abatement projects sufficient to meet the house builder's zero carbon obligation.”

The report goes onto to state in paragraph 11 that “ultimately it will be the house builders (sic) choice as to which route he chooses”.

Policy DM30: Decentralised Energy

This policy is not in conformity with national policy. It is far too prescriptive. The Government has set out in its consultation report entitled *Next Steps to Zero Carbon Homes – Allowable Solutions* (DCLG, July 2014) that applicants will be able to choose which route they take to meet the allowable solutions element of the energy efficiency (Part L) targets of the Building Regulations. The Council cannot require applicants to justify which route they choose to take.

The Council cannot require that all major development located near a DE network must be designed to connect to the DE network.

Policy DM37: Sustainable Drainage Systems

The policy may need to be amended to reflect the new national planning guidance. The PPG in paragraph ID 7-079 states:

Whether a sustainable drainage system should be considered will depend on the proposed development and its location, for example whether there are concerns about flooding. Sustainable drainage systems may not be practicable for some forms of development (for example, mineral extraction). New development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Additionally, and more widely, when considering major development, sustainable drainage systems should be provided unless demonstrated to be inappropriate.

This advises that only major development should provide SUDs. Therefore insisting that all schemes provide SUDs in all circumstances would not accord with the national practice guidance.

Yours faithfully,

James Stevens, MRTPI
Strategic Planner