

Housing Delivery Test Action Plan

July 2021



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1.0 Introduction

- 1.1 It is widely acknowledged that England is facing a housing crisis and addressing this has been identified as one of the biggest and most urgent challenges facing the country.
- 1.2 The effects of the housing crisis have been particularly severe in Haringey and as such housing is identified as Priority 1 of the Council's Borough Plan. The Covid-19 pandemic has brought the essential role of adequate and high-quality housing even more to the fore with the most vulnerable residents in the borough most exposed to the pandemic.

What is the Housing Delivery Test?

- 1.3 In recent years, the Government has implemented a variety of measures in an attempt to address the multiple housing failures that make up the crisis. A key area of focus has been efforts to deliver more new homes and at a faster rate. In 2018, the Government introduced a new 'Housing Delivery Test' (HDT) as part of changes to the National Planning Policy Framework (NPPF). The Housing Delivery Test result is a percentage measurement of the number of net homes delivered against the number of homes required (the 'housing target') over a three-year period. Subject to performance over a rolling three-year period, the following consequences apply to local planning authorities:
 - The publication of an action plan if housing delivery falls below 95% of a local planning authority's adopted housing requirement;
 - A 20% buffer on a local planning authority's five-year land supply if housing delivery falls below 85% of the adopted housing requirement (this in effect would require the Council to find sites for an additional 20% of the housing requirement); and
 - The application of the presumption in favour of sustainable development if housing delivery falls below 75%.

How is Haringey Performing?

- 1.4 The Government published its 2020 HDT Measurement on 19 January 2021. Having regard to the lockdown starting in March 2020 and the measurement covering the period to 31 March 2020, the Government included a grace period of one month's housing delivery in its 2020 calculation. Taking into account the above grace period, Haringey's Housing Delivery Test 2020 measurement was 60%.
- 1.5 Table 1 below shows Haringey's Housing Delivery Test performance since the policy was introduced in 2018.

Table 1 – How Haringey is Performing (2015/16 – 2019/20)

| | Haringey's Housing Completions Figure (official HDT) | HDT Result | Consequences |
|---------|--|------------|----------------------------------|
| 2015/16 | 239 | N/A | N/A |
| 2016/17 | 719 | N/A | N/A |
| 2017/18 | 1,191 | 48% | Action Plan + 20% buffer |
| 2018/19 | 578 | 55% | Action Plan + 20% buffer |
| 2019/20 | 867 | 60% | Action Plan + 20% buffer + PIFSD |

- 1.6 While the 2020 measurement of 60% is an improvement on last year's result (55%), the end of the Housing Delivery Test transitional arrangements mean that the consequences are more severe.

Presumption in Favour of Sustainable Development

- 1.7 In addition to producing this Action Plan and including a 20% buffer in the borough's five-year housing land supply, the Council is now required to apply the 'Presumption in Favour of Sustainable Development' (PIFSD) to decision-making as set out in the NPPF. This took effect on 20 January 2021; the day after the 2020 measurement was published.
- 1.8 In accordance with the NPPF, the PIFSD means the Council's housing planning policies are deemed to be out of date. The consequence of this is that national policy now expects the Council to grant permission for housing schemes unless:
- I. The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.
- 1.9 Paragraph 12 of the NPPF is clear that the PIFSD does not change the statutory status of the development plan (the Local Plan and the London Plan) as the starting point for decision making, as the law still says that any determination on a planning application must be made in accordance with the development plan unless material considerations indicate otherwise. The NPPF is not part of the development plan but the PIFSD as part of the NPPF is a significant material consideration. While the policies in the borough's development plan still have primacy, the Council is required to give an increased amount of weight to the NPPF and PIFSD when making planning decisions.

The Importance of Delivering Housing

- 1.10 The Council's Borough Plan identifies Housing as Priority 1 for the borough and makes a commitment to deliver 1,000 new council homes at council rents. The Council prioritises housing not because buildings or estates are important in themselves, but because the home in which a family lives is one of the most important factors in determining their prosperity and wellbeing. The Haringey Fairness Commission Report set out that secure, good quality housing is a foundation of a decent life and highlighted housing disadvantage as a key factor that contributes to inequalities between different groups of residents in the borough.
- 1.11 While the Council has an ambitious programme to deliver new council homes at council rents it is unable to address the borough's housing challenges alone. The Borough Plan therefore seeks to deliver as many new, good quality homes of all kinds as we can, in good quality neighbourhoods getting as close to the Mayor of London's target for Haringey as set out in the London Plan.
- 1.12 A key benefit of new development in the borough is the delivery of new affordable homes as part of private development. Since 2011, 50.4% of all conventional housing units delivered on Major Sites (10 units and over) have been secured as affordable housing. This totals 2,055 affordable homes. New development contributes to helping ensure every resident has a safe, stable, and affordable home, and that they can participate in community life and achieve their full potential, and in turn supports the building of communities in which everyone can thrive, side by side, as equals.
- 1.13 The delivery of new development in the borough also helps to build and retain wealth in Haringey's communities. The Council is committed to a community wealth-building approach which builds the prosperity of local people and businesses as it travels through the local economy and supports and enriches Haringey's residents and communities – economically, through employment, and socially - with an emphasis on those who are struggling. New development brings significant investment into the borough helping to support the borough's places – particularly high streets and town centres – and growing a good economy in Haringey where everyone benefits.
- 1.14 A further benefit of new development is the contributions it makes to new and enhanced infrastructure in the borough. In March 2020, the Council approved spending of £2.25m of Neighbourhood Community Infrastructure Levy monies on projects across the borough and in December 2020 the Council approved spending of £14.6m of Strategic Community Infrastructure Levy monies on a range of infrastructure projects including £940,000 towards a new temporary youth space in Wood Green, £1.5m towards School Streets and £5.1m towards Streetspace Plan projects for walking and cycling.

Purpose of Action Plan

1.15 This Action Plan has been prepared to show how the Council is responding to the challenge of ensuring that more homes are built in Haringey and faster. In line with National Planning Practice Guidance¹, it:

- Identifies the reasons for under-delivery;
- Explores ways to reduce the risk of further under-delivery; and
- Sets out measures the Council intends to take to improve levels of delivery.

1.16 This document is intended to be a practical document focussed on effective measures aimed at improving delivery within the borough underpinned by local evidence and research of key issues.

¹ <https://www.gov.uk/guidance/housing-supply-and-delivery>

2.0 Housing Delivery in Haringey

- 2.1 The Council's housing targets are set by the London Plan and are derived from an assessment of the capacity within the borough to deliver additional housing.
- 2.2 From the 2015/16 monitoring year to the 2020/21 monitoring year the annual housing target for Haringey was 1,502 homes as set out in the London Plan 2016. Following the publication of the London Plan 2021 the Council's annual housing target has increased to 15,92 homes. This will start to apply from the 2021/22 Housing Delivery Test measurement onwards.
- 2.3 The Council's adopted Local Plan covers the period 2011 to 2026. In line with the relevant targets within the London Plan 2016 and its predecessor document, the Strategic Policies Development Plan Document (DPD) identifies a minimum strategic housing requirement of 19,802 homes over the plan period from 2011-2026. The Council is now in the early stages of preparing a new Local Plan, in part to take into account the higher housing target in the London Plan 2021, and to enable policies and proposals to be drafted that support increased delivery of new homes. The timeframe for this is set out in section 5.
- 2.4 The Ministry of Housing, Communities and Local Government (MHCLG) published its HDT 2020 Measurement on 19 January 2021 measuring delivery in the years 2017/18, 2018/19 and 2019/20. Table 2 below sets out the Government's published measurement together with the Council's own assessment of delivery measurement as reported in the Council's Authority Monitoring Report (AMR) 2019/20.

Table 2 – Housing Delivery Test Measurement

| | Number of Homes Required | Number of Homes Delivered | |
|--|--------------------------|---------------------------|-----------------------|
| | | MHCLG Figures | Council's own Figures |
| 2017/18 | 1,502 | 1,191 | 1,210 |
| 2018/19 | 1,502 | 578 | 644 |
| 2019/20 | 1,502 | 867 | 919 |
| Total | 4,506 | 2,636 | 2,773 |
| Housing Delivery Test Measurement | | 60% | 62% |

- 2.5 There are discrepancies between the Government's published figures and the Council's own assessment of delivery over the three monitoring years. This was raised

with MHCLG in the Council’s response to the Government’s consultation on Housing Supply statistics. However, notwithstanding these discrepancies, it remains the case that delivery fell considerably short of the required levels across the three-year period. It is not the case however that Haringey is a persistent under-performer in housing delivery terms. This is illustrated in the table below which shows delivery achieved so far against the cumulative target.

Table 3 – Haringey’s annual housing delivery performance since 2011

| | 11/12 | 12/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | 19/20 |
|-----------------------------------|--------------|----------------|----------------|----------------|------------------|------------------|------------------|------------------|-------------------|
| Overall Completions (net) | 1,410 | 1,290 | 501 | 640 | 660 | 774 | 1,210 | 644 | 919 |
| Cumulative Completions | 1,410 | 2,700 | 3,201 | 3,841 | 4,501 | 5,275 | 6,485 | 7,129 | 8,048 |
| Cumulative Target | 820 (820) | 820 (1,640) | 820 (2,460) | 820 (3,280) | 1,502 (4,782) | 1,502 (6,284) | 1,502 (7,786) | 1,502 (9,288) | 1,502 (10,790) |
| Performance Against Target | 590 | 1,060 | 741 | 561 | -281 | -1,009 | -1,301 | -2,159 | -2,742 |

- 2.6 In the first four years of the plan period the borough over-delivered against the London Plan target, which at that time was 820 net dwellings per annum. As of 31 March 2015, there had been surplus delivery of 561 homes in Haringey.
- 2.7 In response to the publication of the 2016 London Plan which increased the Council’s housing target by 83%, the Council took the proactive step of updating its Local Plan. The Council adopted alterations to its Local Plan Strategic Policies DPD in 2017 and adopted a suite of other DPDs in the same year comprising Site Allocations, Development Management Policies and Tottenham Area Action Plan documents.
- 2.8 The Local Plan sets out a comprehensive growth strategy for the borough including allocating sufficient land to achieve housing and other targets. However, despite this, actual delivery rates of housing have not matched those set out in the plan.

3.0 Sites Monitoring

- 3.1 To understand the current and future position in respect to housing delivery in the borough, information was gathered in relation to the pipeline of development sites. This process focussed on larger sites but with consideration also given to the pipeline of small sites in the borough.
- 3.2 As at February 2021, the Council's housing land supply comprised the following, as set out in the AMR 2019/20²:

Table 4 – Haringey housing land supply at February 2021

| Haringey supply of deliverable housing sites (2020/21 – 2024/25) | |
|--|--------|
| Sites with Planning Permission (Started) | |
| Large Sites | 3,813 |
| Small Sites | 298 |
| Sites with Planning Permission / Subject to S106 (Not Started) | |
| Large Sites | 3,673 |
| Small Sites | 553 |
| Deliverable Sites | |
| Large Sites | 3,731 |
| Small Sites | 749 |
| Overall Total | 12,817 |

- 3.3 In accordance with paragraph 73 of the NPPF, a local planning authority is required to have a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The supply of specific deliverable sites should in addition include a buffer. Due to under-delivery of housing in the borough in the past three years the required buffer for the Council is 20%.

² <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/authority-monitoring-report>

3.4 Table 5 below shows the calculation of the Council's housing land supply as at February 2021.

**Table 5 – Haringey five-year housing land supply calculation as at February 2021
(for five-year period April 2020 to March 2025)**

| | Base Figure | Calculation | Cumulative |
|-------------------|--------------|------------------|--------------|
| Annual Target | 1,502 | 5 x 1,502 | = 7,510 |
| + Shortfall | -2,742 | + 2,742 | = 10,252 |
| + Buffer | 2,050 (+20%) | + 2,050 | = 12,302 |
| Total Requirement | | | = 12,302 |
| Supply | | | = 12,817 |
| Surplus | | 12,817 – 12,302 | = 515 |
| Years Supply | 5.04 years | 5 + (515/12,302) | = 5.04 years |

4.0 Key Issues and Challenges

- 4.1 The London Plan sets ambitious housing targets for boroughs. Whilst the Council's evidence indicates that there are sufficient sites available to achieve the targets, the achievement of the targets will still be a significant challenge. The amount and rate of housebuilding in Haringey needs to significantly increase and therefore it is important to be proactive in terms of thinking about, understanding and managing potential risks to future housing supply.
- 4.2 Issues affecting delivery can broadly be broken down into two categories: general barriers to housing delivery and site-specific barriers to delivery. Responses to these barriers are explored in section 5. Key issues identified as affecting delivery in Haringey include the following:

Impact of Covid-19 on housebuilding

- 4.3 The outbreak of Covid-19 in 2020 saw a sharp shock to the housing market and had a significant initial impact on UK housebuilding leading to delays in the delivery of new build homes. However, evidence indicates that the housebuilding industry picked up towards the end of 2020 as housebuilders showed resilience and adaptability in response to the challenges of the pandemic and house prices remained resilient. There does however remain potential for the housebuilding industry to be severely impacted in the event of a post-Covid recession once Government winds down its furlough scheme and other support. In any event, the Action Plan has been developed to be flexible, adaptive and able to respond to future challenges or emerging opportunities relating to housing delivery.

General Barriers

Availability of Land/Sites

- 4.4 Due to the built-up nature of the borough the supply of development land to deliver additional housing is limited.
- 4.5 The number of sites with scope to deliver significant amounts of additional housing is also limited. Large parts of the borough are suburban in character and have a Public Transport Accessibility (PTAL) rating of 1-2 meaning that they are unlikely to be suitable locations for major housing proposals.
- 4.6 The Council's scope to alter the mix of sites allocated or increase the amount of land earmarked for development where delivery falls below the target level is also currently constrained due to competing land use requirements and other important considerations such as the protection of Heritage and Metropolitan Open Land.

Infrastructure Improvements

- 4.7 The borough benefits from several areas of high public transport accessibility. These have been identified as having high potential to accommodate future growth. It is proposed that the accessibility of these areas will be enhanced further as a result of improvements to the Piccadilly underground line service and the (albeit delayed) delivery of Crossrail 2. These improvements will help support increased housing densities and are a key opportunity for the borough meeting its growth targets.

Viability and Deliverability

- 4.8 The Council's evidence indicates that viability of residential development is currently challenging in certain locations and on certain types of development. This is primarily a function of development values and the market rather than being a result of policy burdens or contributions required by the Council.

Site-Specific Barriers

- 4.9 There are a variety of issues which affect specific sites causing slower rates of homebuilding. These include:

- Legal issues (e.g. lease arrangements, covenants, rights to light)
- Complex landownership with multiple land parcels
- Infrastructure safeguarding (e.g. Crossrail 2)
- Reliance on other developments to come forward
- Infrastructure requirements
- Viability and planning obligations
- Land contamination
- Access to/from the site

- 4.10 A key barrier to the timely delivery of many of the borough's larger development sites is the presence of multiple landowners.

5.0 Current and Future Actions

The Borough Plan: Corporate Prioritisation of Housing

- 5.1 The Council has committed to significantly boosting housing delivery in the borough. The Borough Plan 2019-2023³ identifies Housing as Priority 1 for the borough. It includes a specific objective (1a) to deliver as many new, good quality homes of all kinds as we can, in good quality neighbourhoods, getting as close as possible to the Mayor's housing target for Haringey.
- 5.2 Actions in the Borough Plan specifically for this objective commit the Council to:
- Monitor the supply of new homes through the planning system;
 - Work in close partnership with housing associations and developers to secure investment in the new homes Haringey needs;
 - Negotiate planning applications and enforce planning policy to ensure the right quality and mix of homes; and
 - Deliver a wide range of high-quality homes through our Tottenham and Wood Green programmes.
- 5.3 The Council is taking on a leadership role in relation to housing delivery. This involves taking a variety of actions to improve housing delivery directly and indirectly. However, the Council recognises that a step change in delivery will require a partnership approach and is therefore committed to working together with key partners to secure investment in the new homes that Haringey needs.

The Borough Plan: Yearly Delivery Plans

- 5.4 In order to ensure that the Borough Plan is delivered the Council has produced yearly delivery plans for each priority. A Year Two Housing Delivery Plan⁴ was approved by the Council in February 2020 building on the Year One Plan to ensure the Council is on target with its housing objectives. Table 6 sets out a selection of key milestones and actions under objective 1a of the adopted Delivery Plan.

³ www.haringey.gov.uk/local-democracy/policies-and-strategies/borough-plan

⁴ www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=9157&Ver=4

Table 6 – Housing Delivery Plan milestones and actions for Objective 1a

| Delivery Priorities | High Level Milestone(s) | Years 3-4 |
|--|---|---|
| Deliver New Local Plan | Local Plan Review has commenced. Consultation on high-level Issues and Options underwent Nov 2020-March 2021. Detailed consultation on sites to get underway in early 2022. | Submission of Local Plan for examination post consultation and subsequent adoption. |
| Make Haringey an attractive place to invest | On-going engagement with HA sector on a quarterly basis. | TBC |
| | Monitor the supply of new homes and publish Annual Monitoring Report (AMR) | TBC |
| Deliver new housing through area-based interventions | Council house delivery programme. Deliver 1,000 homes by 2022 | |
| | Deliver new homes at High Road West, securing substantial community benefits through the process (contained in the Economy Priority). | TBC |

Council Homebuilding

- 5.5 Delivering new Council homes is one of the Council’s highest priorities. The Council has committed, through Borough Plan objective 1c, to deliver 1,000 new Council homes at Council rent by 2022. Table 7 below sets out a range of milestones and actions for objective 1c of the Year Two Housing Delivery Plan approved by the Council in February 2020.
- 5.6 The Council is acquiring and building a range of new homes on its own land to address housing need across the borough, and it has been able to secure substantial funding (over £60m) from the Mayor of London to assist the programme. A new Housing Delivery Team has been established to identify development opportunities, secure planning consents, and procure direct delivery. To date, the Council has identified 77 sites for its homebuilding programme, up from 56 the year before. The Council has enabled 394 social rent homes to have started on site by May 2021, including s106 acquisitions and in the same period it will have obtained planning permission for 526 new social rent homes as part of its target of delivering the 1,000.
- 5.7 The Council continues to identify more sites for its pipeline of sites to ensure it has a sustainable programme and is able to deliver beyond 2022. More information on the Council Housing Delivery Programme is available on the Council’s website⁵.
- 5.8 In order to help achieve the Council’s corporate housing priority, including to achieve a step change in the number of new homes being built, the Council is preparing a new Housing Strategy in 2021.

⁵ www.haringey.gov.uk/housing/council-homes/haringey-homes

Table 7 – Housing Delivery Plan milestones and actions for Objective 1c

| Delivery Priorities | High Level Milestone(s) | Comments and Budget Considerations | Years 3-4 |
|--|--|--|---|
| Identify the land for new council housing | Ongoing programme to identify new sites for housing delivery, with new sites presented at least quarterly to Cabinet dependent on opportunities presented. | | Further grant applications subject to confirmation from GLA of affordable housing grant programmes. Annual update to HRA Business Plan. |
| Ensure that finance is available to deliver the programme | Sustainable financial compensation level to be agreed for HRA land transfer to General Fund by September 2020. | Programme delivery is dependent on GLA grant funding and HRA funding, including borrowing. | Further grant applications |
| | MoL grant to be drawn down as each scheme achieves Start on Site (SoS). 1,000 SoS expected to be achieved by March 2022. | | Annual update to HRA Business Plan |
| Develop the capacity within the Council to deliver the new homes | The Housing Delivery Team consists of around 24 people and includes dedicated Communications, Planning, Finance and Procurement Officers. | MoL Housing Delivery Capacity Building Fund extends into Year 2. | Continued recruitment in line with need to deliver housing targets. Development of additional specialist capacity (people and processes) as more complex sites are taken on |
| Deliver new Council homes via acquisitions and direct delivery | 1,429 new council homes to have planning permission and 1,000 homes to have started on site by March 2022. | Significant capital expenditure, already budgeted for, will take place. | Annual targets to be set for permissions, starts and completions |

Place-making

- 5.9 The Council is committed to making Haringey a great place for all. To support this, it is investing in making the borough's places better. Improvements being delivered by the Council are focused on Tottenham and Wood Green, two areas with high potential to accommodate new homes.
- 5.10 To date, the Council's regeneration programme has helped unlock thousands of new homes in Tottenham. The Council has been very effective at leveraging public sector and private sector investment and will continue to monitor and bid for infrastructure and other development funding as and when opportunities arise. The Council's

interventions have helped support an uplift in development values in Tottenham and are contributing to improved viability across the area which is enabling development to start to come forward which might not otherwise have been deliverable.

- 5.11 In March 2017, the Council entered into a Strategic Development Partnership (SDP) with Argent Related. This partnership combines the land holdings of both Argent Related and the Council and is helping to ensure that the Council delivers its promise to create 5,000 homes, 4,000 jobs as well new commercial, retail, residential, leisure and entertainment spaces in Tottenham Hale. In 2019/20, the Council granted permissions for a number of major sites in the partnership’s ownership which have begun to deliver on site.
- 5.13 The Council is currently preparing an Accommodation Strategy which will set out a strategy for the future use and development of Council owned sites in Wood Green including the delivery of a new civic hub. Flowing from the strategy will be the identification of a range of opportunities to deliver new homes.

New Local Plan

- 5.14 The Council’s current Local Plan sets out a framework for growth and development in the borough to 2026. In anticipation of the new London Plan being published, and its increased strategic housing target, the Council commenced work on a new Local Plan in 2020. The Council carried out a New Local Plan: First Steps Engagement from November 2020 to February 2021 which received over 1000 responses. Alongside this the Council carried out a ‘Call for Sites’ exercise to ask landowners, site promoters, developers and other stakeholders to put forward sites that they consider suitable for housing and other growth needs. The Council is currently preparing a Draft Local Plan (Regulation 18) for consultation in early 2022.
- 5.15 Table 8 below sets out the current timetable for the New Local Plan.

Table 8 – Timetable for the Local Plan review

| Key Dates | Action | Regulation |
|-------------------|--|-------------------|
| 2020/2021 | Local Plan scoping and evidence base commissioning | |
| Nov 2020-Feb 2021 | First Steps Engagement | Pre-Regulation 18 |
| Early 2022 | Draft Local Plan consultation | Regulation 18 |
| 2022 | Proposed Submission Local Plan consultation | Regulation 19 |
| 2022/2023 | Submission to Secretary of State and Examination, consultation on modifications, and Examiner’s Report | Regulations 22-25 |
| 2023 | Adoption | Regulation 26 |

- 5.16 Through the production of a new Local Plan, and taking into account new evidence including about design, density and land needed for other uses, the Council will seek to identify additional housing capacity. A key part of this will be assessing sites submitted through the 'call for sites' exercise through an updated Strategic Housing Land Availability Assessment.
- 5.17 The London Plan 2021 includes a target for the delivery of small sites in the borough. This requires the Council to give particular consideration to the potential within the Borough to accommodate an uplift in residential development within more suburban areas, and smaller developments such as upwards extensions to existing buildings and within town centres. This will further aid in delivery of additional housing through the production of clear policy and guidance for these sites. The Council overall will continue to maintain a strong housing and viability evidence base.
- 5.18 To support the New Local Plan there will also be an update to the Council's Infrastructure Delivery Plan to ensure that infrastructure is available to support planned growth and to identify any improvements that are needed to support/unlock new development. In association with this, the Council will prepare its next Infrastructure Funding Statement to be published in Summer 2021 which will help support site delivery.

Neighbourhood Forums

- 5.19 The Council notes the potential for Neighbourhood Plans to contribute to increased housing supply within the borough. At present only one Neighbourhood Plan has been 'made' / adopted in the borough which is for the Highgate Neighbourhood Area. Neighbourhood Forums have also been designated for Crouch End and Finsbury Park and Stroud Green with a view to preparing Neighbourhood Plans for these respective areas. On 7 May 2021, the Council approved the re-designation of the Crouch End Neighbourhood Forum. The Council will fulfil its legal obligations to support these Neighbourhood Forums to encourage positive plans for additional housing.

Brownfield Land Register

- 5.20 In order to increase the supply of new homes in the borough it is important that as many potential housing sites have been identified as possible. To support this the Council published a Brownfield Land Register update in March 2021 which gives developers, particularly smaller housebuilders, more certainty and choice in what sites can be delivered for housing. The next update is due in March 2022.

Development Management Performance

- 5.21 As shown in Table 9 the Council has a high performing Development Management service, and it is not considered that the speed or quality of decisions is a major barrier to delivery.

Table 9: Development Management Performance

| | Metric | 2019/2020 | 2020/2021 |
|---------------------------|-----------------------------------|-----------|-----------|
| Majors | Number decided | 19 | 20 |
| | Percentage decided on time | 100% | 100% |
| | average time of decision | 209 days | 365 days |
| Minors | Number decided | 436 | 453 |
| | Percentage decided on time | 95% | 94% |
| | Average time of decision | 77 days | 85 days |
| Other applications | Number decided | 1083 | 1,157 |
| | Percentage decided on time | 96% | 92% |
| | Average time of decision | 63 days | 61 days |

- 5.22 In 200/21 the Development Management service determined 100% of Major Applications within the statutory time period or an otherwise agreed time period which puts the Council in the top quartile in London for Major Applications. The Council is proactive in seeking to resolve issues with internal and external consultees and has regular liaison with all of them. The Council has also undertaken an exercise of reviewing standard conditions with a view to reducing the numbers added to decision notices, including being pragmatic and flexible regarding trigger dates.
- 5.23 Council officers are continuing to undertake Councillor training to help ensure decisions, particularly on major sites, are determined in accordance with the Development Plan and to ensure the Council is not taken to appeal unnecessarily.

Partial Review of Community Infrastructure Levy (CIL) Charging Schedule

- 5.24 The Council consulted on a Draft Community Infrastructure Levy Charging Schedule, from Wednesday 18 December 2019 to Tuesday 11 February 2020. The Draft Charging Schedule (DCS) consultation proposed to increase CIL rates for residential uses in the east of the borough. The DCS is due to be submitted for examination in Summer 2021 and, subject to the outcome of examination, will take effect from early 2022. Increased CIL rates will help fund infrastructure to support development across the borough, whilst not setting the new rates at such a level that would have a negative overall impact on development viability.

Annual Authority Monitoring Report (AMR)

- 5.25 The Council monitors a number of key planning indicators, including the supply of new homes, through its AMR. The AMR for 2019/20 sets out that as of 31 March 2020 there were 4,111 units with planning permission that had started on-site and 4,226 units with planning permission which had not started. The Council published its 2019/20 AMR in July 2021. Consideration has been given to how the AMR can best be purposed to support future housing delivery in the borough.

Monitoring of Development Pipeline

- 5.26 Since the introduction of the Housing Delivery Test, the Council has engaged proactively with developers running sessions specifically to seek views on how development can be speeded up. An Agents Forum was held in November 2020 allowing agents and developers to highlight, among other things, the challenges experienced by the industry as a result of the Covid-19 crisis. Since the forum, the Development Management service has begun looking at addressing some of the issues that may be precluding development from coming forward, to ensure delivery can be accelerated. This includes options for fast-track decisions, the Council helping in site masterplans and revised site allocations as part of the new Local Plan. Given the Council's ambition to deliver 1,000 new council homes in the borough, the Council may be able to speed delivery by acquiring properties on schemes, which may help speed delivery by providing more certainty to the developer regarding sales. At the Forum developers were advised of opportunities to promote sites through the New Local Plan Process. The next Forum is scheduled for Q3 2021.

6.0 Implementation and Monitoring

6.1 Table 9 below sets out the key actions the Council is implementing to help boost housing delivery in the borough.

Table 9 – Key implementation actions in relation to housing delivery in the borough

| Key Actions for Implementing | | |
|--|------------------|---------------|
| Action | Team Responsible | Delivery Date |
| <p>New Local Plan Work commenced on a new Local Plan in 2020. The timetable for this process is set out in Table 8. This will plan for the increased housing target in the London Plan 2021.</p> | Planning Policy | 2023 |
| <p>Neighbourhood Forums The Council will fulfil its legal obligations to support existing Neighbourhood Forums to encourage positive plans for additional housing.</p> | Planning Policy | Ongoing |
| <p>Brownfield Land Register The Council published a Brownfield Land Register update in March 2021. The next update is due in March 2022.</p> | Planning Policy | March 2022 |
| <p>Monitoring of development pipeline The Planning Policy Team will continue to engage proactively with applicants, agents and developers who have been granted planning permission on major sites to find out if there are any issues preventing the delivery of housing.</p> | Planning Policy | Ongoing |
| <p>Build out rates The Council will continue to monitor build out rates and obtain information on barriers to delivering housing. The new London Planning Data Hub will significantly aid in this monitoring and will feed directly into the AMR.</p> | Planning Policy | Q2 2021 |
| <p>Call for sites A new 'Call for Sites' as part of the Local Plan has been undertaken to identify suitable and deliverable land for housing that has not already been identified.</p> | Planning Policy | Q1 2021 |
| <p>Evidence Base review The Council will include Employment Land as part of the Local Plan review to enable it to assess its continued suitability, and to explore options for co-locating residential and employment uses, as well as industrial intensification to potentially release land for additional housing. A small sites study is also being considered.</p> | Planning Policy | 2021 |
| <p>Duty to Cooperate The Council will continue to fulfil its statutory Duty to Cooperate with neighbouring boroughs and other relevant authorities on strategic and infrastructure matters</p> | Planning Policy | Ongoing |
| <p>CIL spending</p> | Planning Policy | Ongoing |

| | | |
|---|--------------------------|---------|
| The Council will continue to improve local and strategic infrastructure by monitoring the spending of allocated CIL to support housing growth by providing necessary supporting infrastructure. | | |
| CIL Partial Review The Council consulted on a Draft Community Infrastructure Levy (CIL) Charging Schedule from 18 December 2019 to 11 February 2020. The Draft Charging Schedule (DCS) consultation proposed to increase CIL rates for residential development in the east of the borough. The DCS is due to be submitted for examination in Summer 2021 and, subject to the outcome of examination, will take effect from early 2022. The proposed increased rates will help fund infrastructure to support development across the borough, whilst not being set at such a level that would have a negative overall impact on development viability. | Planning Policy | 2022 |
| Annual Authority Monitoring Report The Council monitors a number of key planning indicators, including the supply of new homes, through its AMR. The Council published its 2019/20 AMR in July 2021. | Planning Policy | Q3 2021 |
| Determination times Continue to determine applications in accordance with current National, Regional and Local planning policy and guidance and remain a top performing Council for application determination time. | Development Management | Ongoing |
| Conditions placed on planning applications Continue to ensure that conditions are necessary, and the trigger points are appropriate. | Development Management | Ongoing |
| Developers Continue to seek opportunities to listen to developers' views as to why development is not being implemented. Next Agents Forum in Q3 2021. | Development Management | Q3 2021 |
| Member training Ongoing programme of training | Development Management | Ongoing |
| Planning Performance Agreements (PPAs) and Quality Review Panel (QRP) The Council offers PPAs for major development proposals and has a QRP for design. The uptake of such services will continue to be encouraged to ensure developers receive high quality advice that enables policy compliant schemes to come forward quickly and obtain permission. | Development Management | Ongoing |
| Council Delivery of Council Housing See www.haringey.gov.uk/housing/council-homes/haringey-homes | Housing and Regeneration | Ongoing |

6.2 It will be extremely challenging for Haringey to deliver a 94% increase in its annual housing target versus the 2015 policy position, especially given that the London Plan does not allow for a stepped housing target. The Council is already undertaking a great deal of work to facilitate development and will continue to do so. However, it is outside the Council's control to determine how long (or if even) a developer implements a planning permission, and then the timeframes for build out rates. There are no significant incentives or disincentives for developers to build out to a rate

needed by the Council, this will always be borne out by market conditions and likely profit levels required by the developer, which in some cases a slow build out rate to 'drip feed the market' may be desirable.

- 6.3 The actions within this plan will go some way to help increase and accelerate housing delivery, particularly through a New Local Plan with new site allocations, and through the Council's own delivery of sites. However, at this stage, the Council highlights that it is unlikely to meet this target immediately given the lag between actions and the implementation of actual permissions as a result.
- 6.4 This Action Plan will be monitored and reviewed by the Planning Policy Team on an annual basis and published online. Monitoring information will continue to be collected from a range of sources such as the AMR, the Haringey Borough Plan, the London Planning Data Hub, appeals monitoring along with any other relevant documents. The 'Actions' will be implemented by those services indicated in the 'Team Responsible' column. Actions will be updated where necessary and new actions will be added in response to any changes in legislation, Government policy and practice guidance.

For further information please contact

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