

Housing Delivery Test Action Plan

August 2020



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1.0 Introduction

- 1.1 The delivery of new homes is a key national issue. In recent years, the Government has implemented numerous measures in an attempt to help stimulate and support home building, including ongoing reform of the planning system.
- 1.2 Delivering new homes is also a key local issue, with Housing being a top Priority of the Council's Borough Plan. Stimulating and supporting home building is particularly important in light of the Covid-19 crisis which has had a negative impact on development activity. Whilst the health and wellbeing of the most vulnerable residents will always be the Council's prime concern for action, supporting and stimulating the public and private home building sectors to recover from this crisis is important, particularly in delivering homes for local Haringey residents.
- 1.3 In 2018, the Government published a revised version of the National Planning Policy Framework (NPPF). As part of the changes a new 'Housing Delivery Test' (HDT) was introduced to be implemented on a phased basis. During the transitional phase the HDT has the following consequences for this years HDT:
- The publication of an action plan if housing delivery falls below 95% of a local planning authority's adopted housing requirement over the previous three years;
 - 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 additional sites for an additional 20% of the housing requirement); and
 - The 'presumption in favour of sustainable development' in the NPPF would apply automatically if housing delivery falls below 45% of the adopted housing requirement.
 - Once transitional arrangements have ended in November 2020 the 'presumption in favour of sustainable development will apply if housing delivery falls below 75% in future years.
- 1.4 The Government published its 2019 HDT Measurement in February 2020 (delayed from November 2019). This indicated that the borough had delivered only 55% of its housing requirement in the preceding three years. Therefore, an Action Plan is required to be published but the presumption in favour of sustainable development does not apply, as the target for this year under the transitional arrangements stated above is 45%.
- 1.5 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:

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

- 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.
- 1.6 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.

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. **The Borough's current target is set out in the 2016 London Plan and is 1,502 homes per year.** This was increased from the 2011 London Plan, which was set at 820 new homes. This represented an 83% rise and a step change in the required level of housing delivery required in recent years.
- 2.2 In 2019, the Mayor issued to the Secretary of State his intention to publish a new London Plan, which includes a range of interventions to help meet the need for housing. The Draft version increases Haringey's annual housing target from 1,502 to 1,958. However following examination, the Panel Inspectors recommended that the target be reduced to 1,592 homes and this has been accepted by the Mayor.
- 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 likely higher housing target in the 2020 version of the London Plan, and to enable policies 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 latest HDT Measurement in February 2020 measuring delivery in the years 2016/17, 2017/18 and 2018/19. Table 1 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) 2018/19².

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

Table 1 – Housing Delivery Test Measurement

	Number of Homes Required	Number of Homes Delivered – MHCLG Figures	Number of Homes Delivered – Council's own Figures
2016/17	1,502	719	774
2017/18	1,502	1,191	1,210
2018/19	1,502	578	644
Total	4,506	2,488	2,628
Housing Delivery Test Measurement		55%	58%

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 has been raised with MHCLG in the Council's response to the Government's consultation on Housing Supply statistics³. 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 2 – Haringey's annual housing delivery performance since 2011

	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19
Overall Completions (net)	1,410	1,290	501	640	660	774	1,210	644
Cumulative Completions	1,410	2,700	3,201	3,841	4,501	5,275	6,485	7,129
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)
Performance Against Target	590	1,060	741	561	-281	-1,009	-1,301	-2,159

³ www.gov.uk/government/consultations/housing-supply-net-additional-dwellings-statistics-proposed-changes-to-revisions-policy

- 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 the 31st March 2015, there had been surplus delivery of 561 homes in Haringey.
- 2.7 In response to the 2016 London Plan and the requirement to significantly boost the delivery of homes, 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 on 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 2020 the Council's housing land supply comprised the following, as set out in the AMR 2018/19⁴:

Table 3 – Haringey housing land supply at February 2020

⁴ <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/authority-monitoring-report>

Haringey supply of deliverable housing sites (2019/20 – 2023/24)	
Sites with Planning Permission (Started)	
Large Sites	4,337
Small Sites	298
Sites with Planning Permission / Subject to S106 (Not Started)	
Large Sites	2,915
Small Sites	551
Deliverable Sites	
Large Sites	2,865
Small Sites	728
Overall Total	11,694

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%. Table 4 below shows the calculation of the Council's housing land supply as at February 2020.

Table 4 – Haringey five-year housing land supply calculation as at February 2020 (for five-year period April 2019 to March 2024)

	Base Figure	Calculation	Cumulative
Annual Target	1,502	5 x 1,502	= 7,510
+ Shortfall	-2,159	+ 2,159	= 9,669
+ Buffer	1,934 (+20%)	1,934	= 11,603
Total Requirement			= 11,603
Supply			= 11,694

Surplus		11,694 – 11,603	= 91
Years Supply	5.03 years	5 + 91/(11,603)	= 5.03 years

4.0 Key Issues and Challenges

- 4.1 The new London Plan continues to set ambitious housing targets for boroughs. The amount and rate of housebuilding in Haringey therefore needs to increase significantly if the borough is to meet its housing delivery targets. Whilst the Council's evidence indicates that there are sufficient sites available to achieve the current targets, the achievement of the targets will still be a significant challenge given delivery rates had to increase an initial 83% per year from 2015 levels to meet the 2016 London Plan target, and another slight increase of 90 homes per annum to meet the new London Plan target. It is therefore 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:

Recovery of the home building development industry from Covid-19

- 4.3 The likely problems arising from the crisis will almost inevitably have a detrimental impact on housing delivery, even if only short term. The Action Plan has been developed to be flexible, adaptive and be able to reflect emerging opportunities for additional housing delivery to help in an economic recovery post Covid 19. These will be added to this section as data and studies emerge.
- 4.4 One of the first such studies to be published by Barton Willmore predicts housebuilding will decrease by a third, up until the middle of the decade as a result of the pandemic.

General Barriers

- 4.5 **Availability of Land/Sites**
- 4.6 Due to the built-up nature of the borough the supply of development land to deliver additional housing is limited.
- 4.7 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.

4.8 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.

4.9 **Infrastructure Improvements**

4.10 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 delivery of Crossrail 2. These improvements will help support increased housing densities and are a key opportunity for the borough meeting its growth targets. However, for infrastructure funding and other programming reasons, it is currently unclear when these improvements will take place. The uncertainty in this regard has potential to affect the speed at which key allocations get built out.

4.11 **Viability and Deliverability**

4.12 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

4.13 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

4.14 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 2019-2023⁵ adopted by the Council in March 2019 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 new 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
 - 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 directly and indirectly improve housing delivery. 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 Plan⁶ was approved by the Council in February 2020 building on the Year One⁷ Plan to ensure the Council is on target with its housing objectives. Table 5 sets out a selection of key milestones and actions under objective 1a of the adopted Delivery Plan.

Table 5 – Housing Delivery Plan milestones and actions for Objective 1a

⁵ www.haringey.gov.uk/local-democracy/policies-and-strategies/borough-plan

⁶ www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=9157&Ver=4

⁷

www.minutes.haringey.gov.uk/documents/s110232/Appenidx%203_Borough%20Plan%20Housing%20Priority.pdf

Delivery Priorities	High Level Milestone(s)	Years 3-4
Deliver New Local Plan	Commence Local Plan Review including Issues and Options Consultation	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	Consult on Wood Green area action plan (AAP) following on from a decision on Council-owned sites	Publish Wood Green AAP for submission in 2020-21
	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 6 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. In January 2020 Cabinet agreed to add a further nine sites to the Council's programme which could provisionally deliver 380 homes, joining the 47 sites agreed in July 2019. The Council enabled 350 new Council homes to have started on site by May 2020, including s106 acquisitions and in the same period it will have obtained planning permission for 450 new 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 website⁸.

⁸ www.haringey.gov.uk/news/haringey-announce-exciting-plans-council-housing-delivery-programme

- 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 will be preparing a new Housing Strategy in 2020.

Table 6 – 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). 542 SoS expected to be achieved by December 2020.		Annual update to HRA Business Plan
Develop the capacity within the Council to deliver the new homes	Internal partnership protocols put in place/fully established with Finance, Legal, Property, Regeneration, Planning and Procurement Teams, and with Homes for Haringey (HfH) by September 2020.	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	500 new council homes to have planning permission and 350 homes to have started on site by May 2020.	Significant capital expenditure, already budgeted for, will take place.	Annual targets to be set for permissions, starts and completions

Regeneration

- 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 ensure 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 2018/19 the Council granted permissions for a number of major sites in the partnership's ownership which have begun to deliver on site.
- 5.12 The Council is committed to ensuring sites can come forward. This can be seen at the Wards Corner site in Seven Sisters, where Compulsory Purchase powers have been used to enable the Council and its development partner Grainger PLC to bring forward a comprehensive mixed-use development scheme including nearly 200 new homes.
- 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 response to the likely adoption of the new London Plan in 2020, the likelihood of an increased strategic housing target within that plan, and also the need to have an up-to-date planning framework to support a step change in housing delivery, the Council commenced work on a new Local Plan in 2020.

- 5.15 Table 7 below sets out the timetable for the review as confirmed by the new Local Development Scheme (LDS)⁹ approved by the Council in November 2019. The commencement of consultation on an Issues and Options consultation will be delayed.

Table 7 – Timetable for the Local Plan review

Key Dates	Action	Regulation
2019-2020	Local Plan scoping and evidence base commissioning	
March-May 2020	Local Plan Issues and Options consultation	Pre-Regulation 18
October-December 2020	Draft Local Plan consultation	Regulation 18
April-June 2021	Proposed Submission Local Plan consultation	Regulation 19
July-December 2021	Submission to Secretary of State and Examination, consultation on modifications, and Examiner's Report	Regulations 22-25
February 2022	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 be able to increase the amount of land available for housing. A key part of this will be by undertaking a 'call for sites' exercise to ask landowners and utilities companies, as well as the Council to put forward sites that they consider suitable for housing and other growth needs. These will be assessed by Council officers and those deemed suitable can then inform an updated Strategic Housing Land Availability Assessment which will feed into the preparation of a new Local Plan and should therefore boost supply and delivery in time.
- 5.17 To support the review 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 an Infrastructure Funding Statement to be published in December 2020 which will help support site delivery.
- 5.18 The new London Plan proposes an increase in the delivery of small sites, and there are emerging Government proposals to allow upwards extensions on existing residential blocks. Partly in response to this, the Council will undertake a 'Small Sites Study' to understand the potential within the Borough to accommodate an uplift in residential development within more suburban areas, and smaller developments such

⁹ www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-development-scheme-lds

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.

Wood Green Area Action Plan

- 5.19 In advance of the new Local Plan the Council is advancing the preparation of the Wood Green Area Action Plan. Wood Green is identified in the Local Plan as a Growth Area with potential to support a significant number of new homes and jobs. It is proposed that a Regulation 19 consultation on the Draft Area Action Plan will take place in 2020 with submission in 2020-2021.
- 5.20 The next steps for the Wood Green Area Action Plan are dependent on the final confirmation of the proposals for the Council's own sites which are awaiting a final decision on the Council's emerging Accommodation Strategy, for which further detailed feasibility work on two preferred sites for a new Civic Hub are being explored prior to a recommendation to Cabinet in summer 2020. The adoption of this Area Action Plan will give planning certainty on those sites identified within it, and it sets a proactive and positive framework for the delivery of additional housing, much of it at higher densities in accessible locations.

Supporting Neighbourhood Forums

- 5.21 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. The Council will support these Neighbourhood Forums and any others that are subsequently designated to prepare Neighbourhood Plans and encourage a positive Plan for additional housing.

Brownfield Land Register

- 5.22 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 December 2019 which gives developers, particularly smaller housebuilders, more certainty and choice in what sites can be delivered for housing. This Register was further updated in March 2020. The next update is due in March 2021.

Development Management Improvements

- 5.23 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. In 2019/20, the Council decided 3,094 planning applications including 19 major applications, 436 minor applications, and 1,083 other applications. The Development Management service determined 100% of these 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's performance for Minor applications is in the top quartile in London at 95%. Other applications are also top quartile in London at 97% and discharge of conditions is at 88% on time. Performance has improved even further in the latter part of the year and it is expected to be top quartile in all categories in the next financial year.
- 5.24 In 2019/20, the average time of decision for Major applications decreased from 248 to 209 days, however all of these have been subject to planning performance agreements/extensions of time which are mutually agreed with applicants and encouraged in national guidance. The average decision time has slightly increased for Minor applications from 76 days to 77 days, as well as Other applications from 60 days to 63 days. 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.
- 5.25 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

- 5.26 The Council consulted on a partial review of the Haringey Community Infrastructure Levy (CIL) Charging Schedule, which has been in effect since 2014, from Wednesday 18 December 2019 to Tuesday 11 February 2020. The Draft Charging Schedule (DCS) consultation proposed to increase CIL rates for some parts and uses of the borough. This 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. The DCS will progress to examination in 2020 and take effect from 2021.

Annual Authority Monitoring Report (AMR)

- 5.27 The Council monitors a number of key planning indicators, including the supply of new homes, through its AMR. The AMR for 2018/18 set out that the Council has had 4,635 units with planning permission and started on-site and 3,466 with planning permission but not started. The Council published its 2018/19 AMR in January 2020.

Consideration has been given to how the AMR can best be purposed to support future housing delivery in the borough.

Monitoring of Development Pipeline

- 5.28 Since the recent 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 planned to take place in April 2020 but unfortunately due to the Covid-19 crisis, this has been postponed. It is hoped that a new date can be arranged for late summer 2020. This will also allow an opportunity for agents and developers to highlight to the Council problems experienced by the industry during and following the Covid-19 crisis so that the Council can consider how it can continue to support home building for Haringey residents. Ahead of this, the Council has already started contacting developers and landowners in the borough in order to get a better understanding of the issues that may be precluding development from coming forward, as well as to try to find out how delivery can be accelerated. This may be achieved through the Council helping in site masterplans, or revised site allocations as part of the new Local Plan or using other powers such as Compulsory Purchase Orders where appropriate. 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.

6.0 Implementation and Monitoring

- 6.1 Table 8 below sets out the key actions the Council is implementing to help boost housing delivery in the borough.

Table 8 – Key implementation actions in relation to housing delivery in the borough

Key Actions for Implementing		
Action	Team Responsible	Delivery Date
New Local Plan Work commenced on a new Local Plan in 2020. The new LDS published in November 2019 sets out the timetable for this process. This will plan for the increased housing target.	Planning Policy	Q1 2022
Wood Green Area Action Plan In advance of the new Local Plan the Council is advancing the preparation of the Wood Green Area Action Plan. Wood Green is identified as a Growth Area with potential to support a significant number of new homes and jobs. It is	Planning Policy	2020-2021

proposed that a Regulation 19 consultation on the Draft Area Action Plan will take place in 2020.		
Supporting Neighbourhood Forums The Council will support existing Neighbourhood Forums and any others that are subsequently designated to prepare Neighbourhood Plans and encourage a positive Plan for additional housing.	Planning Policy	Ongoing
Brownfield Land Register The Council published a Brownfield Land Register update in December 2019 and again in March 2020. The next update is due in March 2020.	Planning Policy	2019-2020
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.	Planning Policy	Q2-4 2020
Build out rates The Council will continue to monitor build out rates and obtain information on barriers to delivering housing. A new London Development Database due to be introduced which should significantly aid in this monitoring, and this will feed directly into the AMR.	Planning Policy	Q2 2020
Call for sites A new 'Call for Sites' as part of the Local Plan will be undertaken to identify suitable and deliverable land for housing that has not already been identified.	Planning Policy	Q2 2020
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.	Planning Policy	2020
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 as part of the initial Local Plan consultation Q2 2020. For future stages, the Council will prepare SOCGs as appropriate.	Planning Policy	Q2 2020
CIL spending The Council will continue to improve local and strategic infrastructure using CIL to support housing growth by providing the necessary infrastructure.	Planning Policy	Ongoing
CIL Partial Review The Council consulted on a Draft Charging Schedule (DCS) as part of a partial review of its existing CIL Charging. The DCS proposes to increase CIL rates for some parts and uses of the borough. This will help fund infrastructure to support development across the borough. The DCS will progress to examination in 2020 and take effect from 2021.	Planning Policy	2020-21
Annual Authority Monitoring Report	Planning Policy	Q4 2020

The Council will publish an AMR for 2019/20 in December 2020		
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.	Development Management	Ongoing
Member training Ongoing programme of training including Daylight & Sunlight in High Density Areas	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 Target of 1,000 homes, plus delivering small schemes on infill sites and within any estate regeneration, subject to ballot. Monitoring through the Borough Plan and Housing Priority Board that have been set up in 2019.	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 if) 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 an updated Local Plan with new site allocations, and through the Council's own delivery of sites. However, at this stage, given the Housing Delivery Test steps up to 75% as the target for cumulative three-year delivery in November 2020, 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 Development Database, 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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