

Housing Delivery Test Action Plan

July 2022



Table of Contents

Introduction.....	3
What is the Housing Delivery Test?.....	3
How is Haringey Performing?.....	4
The Importance of Delivering Housing.....	5
Housing Delivery in Haringey.....	7
Sites Monitoring.....	10
Key Issues and Challenges.....	13
Impact of Covid-19 on housebuilding.....	13
General Barriers.....	13
Site-Specific Barriers.....	14
Current and Future Actions.....	15
Corporate Prioritisation of Housing.....	15
Council Homebuilding.....	15
Housing Strategy.....	16
Place-making.....	17
New Local Plan.....	21
Neighbourhood Forums.....	22
Brownfield Land Register.....	22
Development Management Performance.....	22
Partial Review of Community Infrastructure Levy (CIL) Charging Schedule.....	23
Authority Monitoring Report (AMR).....	23
Monitoring of Development Pipeline.....	23
Implementation and Monitoring.....	24

Front Cover images

1. Haringey Council, Rosa Luxemburg Apartments, Tottenham Hale - 103 council homes at council rents
2. Berkeley Square Developments, The Gessner, Berrol Yard, Tottenham Hale - 166 new homes for rent
3. Clarion Housing Group (Latimer) Evergreen, Green Lanes – 133 apartments and duplexes and new health centre
4. Far East Consortium, Hornsey Town Hall, Crouch End – 144 homes, Arts Centre, Town Hall Square and Hotel

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 housing is identified as an urgent issue in the borough. This includes the affordability of housing, increasing numbers of people sleeping on our streets to renters living in poor quality homes. The Covid-19 pandemic 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 The Housing Delivery Test is an annual measurement of housing delivery introduced by the Government in 2018. The 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.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

- 1.4 From the day following publication of the Housing Delivery Test measurement, where delivery of housing has fallen below the housing requirement, certain policies set out in the National Planning Policy Framework (NPPF) apply. These policies require:
- an authority to publish an action plan if housing delivery falls below 95%;
 - a 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85% (in effect this requires an authority to find sites for an additional 20% of the housing requirement); and
 - application of the 'Presumption in Favour of Sustainable Development' (PIFSD) if housing delivery falls below 75%.
- 1.4.1 The consequences will continue to apply until the subsequent Housing Delivery Test measurement is published. The relevant consequence for any under-delivery will then be applied. Should delivery meet or exceed 95%, no consequences will apply.

How is Haringey Performing?

- 1.4.2 The Government published its 2021 HDT Measurement on 14 January 2022.
- 1.4.3 The national lockdowns in 2020 and 2021 were unprecedented events which saw temporary disruption to local authority planning services and the construction sector. Having regard to this, and for the purposes of the Housing Delivery Test, the Government reduced the ‘homes required’ within the 2019/2020 year by a month and within the 2020/2021 year by four months. Taking account of the above grace periods, Haringey’s Housing Delivery Test 2021 measurement is 75%
- 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 – 2020/21)

	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
2020/21	1458	75%	Action Plan + 20% buffer

- 1.6 The 2021 measurement of 75% is a significant improvement on last year’s result (60%) and reflects an increased level of housing delivery in the borough in 2020/21. As the Council’s 2021 measurement is at or above the Government’s 75% threshold, in accordance with the NPPF, the Council is no longer subject to the ‘Presumption in Favour of Sustainable Development’ (PIFSD) arising from the Test which took effect on 20 January 2021 following the publication of the 2020 measurement. This is an important change which means the Council can once again give maximum weight to its own Development Plan in planning decisions (as opposed to having to give a greater than usual amount of weight to the NPPF’s PIFSD as a significant material consideration).
- 1.7 However, as the 2021 result is below the 95% and 85% thresholds the Council must produce this Action Plan and must continue to include a 20% buffer in its five-year housing land supply.

The Importance of Delivering Housing

- 1.8 A decent home is a human right and everyone who lives in the borough should live in a home that is comfortable, safe and secure. From increasing numbers of people sleeping on our streets to renters living in poor quality homes, London's housing crisis is worse than ever. To help address this, the council will continue building high quality council homes at council rents with a commitment to build 3,000 high quality council homes at council rents by 2031.
- 1.9 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. It is therefore important that it secures as many new, good quality homes of all kinds as it can, in good quality neighbourhoods getting as close to the Mayor of London's new homes target for Haringey as set out in the London Plan.
- 1.10 A key benefit of new development in the borough is the delivery of new affordable homes as part of private development. Since 2011, close to 50% of all conventional housing units delivered on Major Sites (10 units and over) have been secured as affordable housing. 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.
- 1.11 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.
- 1.12 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 different infrastructure including £5.1m towards Streetspace Plan projects for walking and cycling, £1.5m towards School Streets and £940,000 towards a new temporary youth space in Wood Green.



Image: Newlon Housing Trust, Millstream Tower – 117 Shared Ownership and 11 private sale homes.

Purpose of Action Plan

- 1.13 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.
- 1.14 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.

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 in March 2021 the Council's annual housing target increased to 1,592 homes. This increased target will be factored into the 2021/22 Housing Delivery Test requirement.
- 2.3 The Council's existing 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 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 Department for Levelling Up Housing and Communities (DLUHC) published its HDT 2021 Measurement on 14 January 2022 measuring delivery in the years 2018/19, 2019/20 and 2020/21. Table 2 below sets out the Government's published measurement together with the Council's own assessment of delivery.

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

Table 2 – Housing Delivery Test Measurement

	Number of Homes Required	Number of Homes Delivered	
		DHLUC Figures	Council's own Figures
2018/19	1,502	578	644
2019/20	1,502	867	919
2020/21	1502	1458	1496
Sub-total	4,506	2,903	3,059
Total after grace periods applied	3,880		
Housing Delivery Test Measurement		75%	79%

2.5 There are discrepancies between the Government's published figures and the Council's own assessment of delivery over the three monitoring years. However, notwithstanding these discrepancies, it remains the case that delivery fell short of the required level 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	20/21
Overall Completions (net)	1,410	1,290	501	640	660	774	1,210	644	919	1,496
Cumulative Completions	1,410	2,700	3,201	3,841	4,501	5,275	6,485	7,129	8,048	9,544
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)	1502 (12,292)
Performance Against Target	590	1,060	741	561	-281	-1,009	-1,301	-2,159	-2,742	-2,748

- 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. Actual delivery rates of housing have not yet matched those set out in the plan although delivery was almost at target in 20/21 and future delivery looks likely to be considerably improved.



Image: Clarion Housing Group (Latimer) Evergreen, Green Lanes – 133 apartments and duplexes and new health centre.

Sites Monitoring

- 3.1 To understand the current and future position in respect to housing delivery in the borough, the Council regularly gathers information 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 The Council's most recent published housing land supply is 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

3.5 The Council is currently reviewing its housing land supply as part of the preparation of its AMR 2020/21.



Image: Far East Consortium, Hornsey Town Hall, Crouch End – 144 homes, an Arts Centre, Town Hall Square and Hotel.

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 substantially increase. It is therefore important to be proactive in 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 construction leading to delays in the delivery of new build homes. However, the housebuilding industry picked up substantially towards the end of 2020 as housebuilders showed resilience and adaptability in response to the challenges of the pandemic. House prices remained resilient through 2020 and have risen steadily since.

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 PTAL. These have been identified as having high potential to accommodate future growth. The accessibility of these areas will be enhanced further by 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 in 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.



Image: Clarion Housing Group (Latimer) Evergreen, Green Lanes – 133 apartments and duplexes and new health centre.

Current and Future Actions

Corporate Prioritisation of Housing

- 5.1 The Council has identified housing as an urgent issue in the borough. To help address this, the council will continue building council homes at council rents with a commitment to build 3,000 high quality council homes at council rents by 2031.
- 5.2 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.

Council Homebuilding

- 5.3 One of the Council's highest priorities is to start a new era of council housebuilding in the borough. The Council committed, through the Borough Plan (2019-2023) objective 1c, to deliver 1,000 new Council homes at Council rent by 2022.
- 5.4 To do this, the Council launched an ambitious home building programme that is delivering the first new council homes in a generation, with as many as possible built on existing council-owned land. A new Housing Delivery Team has been established to identify development opportunities, secure planning consents, and procure direct delivery. Since its formation the Team has succeeded in securing substantial funding from the Mayor of London to assist the programme.
- 5.5 Information on the Council Housing Delivery Programme is available on the Council's website³ including completed homes and locations where new homes are currently being built.

³ www.haringey.gov.uk/housing/council-homes/haringey-homes

- 5.6 The first thousand Council homes was the first step in a new era of Council housebuilding, and since the Borough Plan was published, the Council has committed to completing 3,000 new quality council homes by 2031. The Council continues to identify more sites for its pipeline to ensure it has a sustainable programme and is able to deliver over the years.
- 5.7 In order to help achieve the Council's corporate housing priority the Council is preparing a new Housing Strategy, a draft of which was approved for consultation in March 2022⁴.

Housing Strategy

- 5.8 The draft Housing Strategy sets out a strategic objective to deliver the high quality and sustainable new homes that Haringey needs. The draft Housing Strategy also sets out the Council's approach to delivering housing on small, medium and large sites:
- To meet our community's diverse needs, we need different homes. This means we need many housing developers working in Haringey, building on large, medium and small sites across the borough.
 - Large private developers bring financial investment, expertise, and economies of scale, as well as local jobs and training. We know that there are sites and opportunities in Haringey that are well suited to large-volume providers, and we encourage their investment.
 - We will work with developers to ensure that their advantages are shared across the construction sector, by supporting the participation of smaller, local firms in their supply chains.
 - We will actively build supportive relationships with local small and medium sized construction firms so that they can thrive and deliver homes in Haringey.
 - Delivering more homes will require more capacity in the construction sector. We will build on existing partnerships with local education providers to increase the number of skills training and apprenticeships across the construction sector in Haringey. We will particularly look to bring forward more small sites for housing. These sites are likely to be less attractive to larger construction firms. Small sites' contribution to housing supply is critical, and in Haringey small sites have delivered a substantial number of new homes. However, the smaller builders specialising in these sites now face a number of obstacles. We will work with local partners to help them to overcome these obstacles.
 - We need to make more effective use of land in Haringey. This includes careful building at higher densities, diversifying the size and location of sites, and promoting more carefully designed co-location and integration of housing with other types of buildings and uses.
 - We will work with other public sector landowners – including the NHS, Network Rail, and the emergency services – to release more land for housing, putting in

⁴<https://www.minutes.haringey.gov.uk/documents/s130938/Draft%20Housing%20Strategy%202022-27.pdf>

place clear plans to bring forward sites for housing and developing partnership approaches to developing such sites.

- We will encourage and support different models of private and public sector delivery.
- Modern methods of construction allow high quality, comfortable homes to be built rapidly. We want to see a significant increase in the share of new homes delivered using Modern Methods of Construction, particularly utilising capacity to precision manufacture homes and significant parts of homes offsite. We will work with the Mayor of London and other councils to develop the capacity, pipeline and consistency required for this new sector to make the impact it is capable of.

Place-making

- 5.8 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.
- 5.9 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 development coming forward which might not otherwise have been deliverable.
- 5.10 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 will deliver 1030 new homes: 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 the SDP masterplan, comprising five sites at the heart of Tottenham Hale. Four of these sites are under construction currently, with the fifth expected to enter into contract this year. Three sites: Welbourne, Ashley Road East and Ashley Road West are due to complete this year.
- 5.11 In March 2022, the Council agreed an acquisitions programme and a pre-contract budget in relation to the Gourley Triangle in Seven Sisters to allow it to gain control of the site and bring forward a comprehensive redevelopment scheme including high quality employment space for small to medium enterprises, alongside much needed Council rented homes.



Image: Berkeley Square Developments, The Gessner, Berrol Yard, Tottenham Hale - 166 new homes for rent. The scheme won the Excellent Homes (Large Scale) award at the Haringey Design Awards 2021.

- 5.11 In July 2022, the Council agreed a delivery approach for the Wards Corner site in Seven Sisters, including proposals for acquisitions of third-party property and land interests, which would put it in a unique position to pursue a new Council-led delivery approach for the site that aligns with its strategic priorities for housing, economy, place and community wealth building and complements Transport for London's plans for Seven Sisters Market.
- 5.12 In 2017 the Council entered into a Development Agreement with Lendlease to deliver the High Road West Scheme in north Tottenham. The scheme aims to deliver 2,600 homes to the area, more than 3,500 jobs, 1,500 training opportunities, £10million of investment into community and business initiatives and programmes and the creation of work, retail, and business spaces in a revitalised town centre. In summer 2021 a resident ballot took place on the Love Lane Estate where the majority of participating residents voted in favour of the redevelopment of the estate as part of the wider High Road West scheme. In July 2022, the Council provided approvals to help facilitate the delivery of the scheme which will benefit from £90m funding from the Mayor of London and will deliver 500 Council homes at Council rents. On 21 July 2022, the Council made a resolution to grant Lendlease's application for the redevelopment of High Road West.
- 5.13 The Council is currently preparing a Cultural Quarter Delivery Plan and Council 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 at the Civic Centre site. Flowing from the strategy will be the identification of a range of opportunities to deliver new homes.
- 5.14 In March 2022 the Council agreed to appoint a contractor to undertake construction of 80 Council rented homes and 356 m² of affordable workspace at the Chocolate Factory site in the Wood Green Cultural Quarter.
- 5.15 Other major developments proposed for delivery as part of a place-making approach include the redevelopment of the St Ann's hospital site in Tottenham which will, subject to planning permission, deliver up to 995 homes.



Image: Haringey Civic Centre. The refurbished building is expected to be available for operational use in September 2024, providing a modern landmark Civic Centre the whole borough can be proud of.

New Local Plan

5.16 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 1500 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 late 2022.

5.17 Table 6 below sets out the current timetable for the New Local Plan.

Table 6 – 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
Late 2022	Draft Local Plan consultation	Regulation 18
2023	Proposed Submission Local Plan consultation	Regulation 19
2023	Submission to Secretary of State and Examination, consultation on modifications, and Examiner’s Report	Regulations 22-25
2024	Adoption	Regulation 26

5.18 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.

5.19 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.

5.20 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 2023 which will help support site delivery.

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 fulfil its legal obligations to support these Neighbourhood Forums to encourage positive plans 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 March 2022 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 2023.

Development Management Performance

5.23 As shown in Table 7 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 7: Development Management Performance

	Metric	2019/2020	2020/2021	2021/2022
Majors	Number decided	19	20	15
	Percentage decided on time	100%	100%	100%
	Average time of decision	209 days	365 days	257 days
Minors	Number decided	436	453	336
	Percentage decided on time	95%	94%	91%
	Average time of decision	77 days	85 days	85 days
Other applications	Number decided	1083	1,157	1,239
	Percentage decided on time	96%	92%	91%
	Average time of decision	63 days	61 days	72 days

5.24 In 2021/22 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.

- 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 On 14 March 2022 Full Council approved a Revised CIL Charging Schedule to take effect on 1 September 2022⁵. Increased CIL rates in the borough's Eastern Charging Zone will help fund infrastructure to support development across the borough.

Authority Monitoring Report (AMR)

- 5.27 The Council monitors several key planning indicators, including the supply of new homes, through its annual 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.

Monitoring of Development Pipeline

- 5.28 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 December 2021 allowing agents and developers to highlight, among other things, the challenges experienced by the industry in delivering more homes and at a faster rate. 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. At the Forum developers were updated about the New Local Plan process and related opportunities to promote potential development sites. The next Forum is scheduled for Q3 2022.

⁵ https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_revised_cil_charging_schedule.pdf

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
<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. As part of the evidence base review the Council is exploring a full range of planning issues including housing, employment, retail, biodiversity and viability.</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 2022. The next update is due in March 2023.</p>	Planning Policy	March 2023
<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 Datahub will significantly aid in this monitoring and will feed directly into the AMR.</p>	Planning Policy	Q2 2022
<p>Call for sites The Council continue to accept submissions for potential sites to be included in the New Local Plan. This is helping identify suitable and deliverable land for housing that has not already been identified.</p>	Planning Policy	Ongoing
<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 The Council will keep under review the allocation and spend of CIL to support housing growth by providing necessary supporting infrastructure.</p>	Planning Policy	Ongoing
<p>Authority Monitoring Report</p>	Planning Policy	Q3 2022

The Council monitors a number of key planning indicators, including the supply of new homes, through its annual AMR. The Council published its 2019/20 AMR in July 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 2022.	Development Management	Q3 2022
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 is proving challenging for Haringey to deliver a 94% increase in its annual housing target versus the 2015 policy position, especially given that the London Plan 2016 did 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 Planning London Datahub, 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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