Haringey LONDON

PLANNING APPLICATION CONSULTATION RESPONSE

SITE/LOCATION:	30-36 Clarendon Road, N8 0DJ
PLANNING REFERENCE AND PROPOSAL:	HGY/2022/3846 Demolition of the existing buildings and construction of a part two, six, eight and eleven storey building plus basement mixed use development comprising 51 residential units and 560 sqm of commercial floorspace, with access, parking and landscaping.
PLANNING OFFICER:	Valerie Okeiyi

HOUSING STRATEGY AND POLICY OFFICER:	Luke Howarth
DATE:	04 April 2023

Summary
Comments to the residential part of the proposed development only. The proposals have been amended following new guidance from the National Fire Chief Council's setting out the need for more than one staircase in new buildings of 18 metres or 7 storeys, as such comments from housing have been revised. Further amendments have been made tenure following comments last month and this is to reassess the plans following these amendments.

The applicant seeks to provide 51 residential units – these are broken down by tenure as:

- 9 low-cost rent units
- 7 intermediate (for sale – shared ownership) units
- 34 private for sale units

Affordable housing provision
The 9 low-cost rent units now proposed are:

- 2x 1B2P
- 1x 2B3P
- 3x 2B4P
- 2x 3B4P
- 1x 3B5P

The 7 intermediate (for sale – shared ownership) units proposed are:

- 3x 1B2P
- 2x 2B3P
- 1x 2B4P
- 1x 3B4P

The 35 private units proposed are:

- 3x studio
- 14x 1B2P
- 6x 2B3P
- 12x 2B4P

Affordable housing provision

Together the low-cost affordable rent and intermediate units proposed provide 16 units out of the 51 units – these are classed as the affordable housing. This represents 31.3% of total units. However, *Haringey's Housing Strategy* sets out that affordable housing provision should be measured by habitable room. On this basis, the low-cost rent units provide 28 habitable rooms out of the total 132 habitable rooms which equates to 21.2% and the intermediate units provide 19 habitable rooms which equates to 14.4%. Combined this represents 35.6% affordable housing by habitable room. Whilst this is approaching compliance with *Haringey's Housing Strategy*, the proposal is shy of meeting the 40% affordable housing by habitable room overall borough target as set out in the Local Plan. If the scheme could move closer to this, we can provide further comment.

The private for sale units total 35 units of the 51 and represent 85 habitable rooms of the 132 habitable rooms across the proposed development, this equates to 64.4%.

Dwelling and tenure mix

On dwelling mix, the recommended mix for the affordable rented housing is:
10% 1 beds, 45% 2 beds, 45% 3 beds (10% 4 beds or more).
This application proposes 22.2% 1 beds, 44.4% 2 beds and 33.3% 3 beds. The low-cost rented provision is now much closer to Haringey's recommended mix and this sees the number of family-sized low-cost (social rent/affordable rent) homes for those in the most housing need increase. Whilst we do see a reduction from 10 units to 9, as family sized homes are the priority for the council, this change is welcome.

The recommended dwelling mix for the intermediate housing (for sale – shared ownership) is:
30% 1 beds, 60% 2 beds and 10% 3 beds.
This application proposes 42.9% 1 beds, 42.9% 2 beds and 14.2% 3 beds. The intermediate provision proposed is closer to meeting Haringey's recommended mix and provides a better balance from 1 to 3 beds homes.

Haringey wishes to see as high a proportion as possible of the new affordable homes being delivered as homes for general needs. The tenure split of the affordable housing provided in the borough should be 60% general needs low-cost social rented housing to 40% intermediate housing and be measured by habitable room. In this application, 59.6% is low-cost rented housing by habitable room versus 40.4% intermediate housing; this is therefore policy compliant.

For intermediate affordable housing, we strongly prefer London Living Rent, as this will generally be the more affordable intermediate product for Haringey residents, but Shared Ownership can be acceptable and is proposed here; in each case our intermediate housing policy applies.

Rents

The Council expects providers to ensure that all new affordable homes being developed are affordable for Haringey residents. For low-cost rented housing for general needs, the Council's preference is for Social Rent, however it recognises that the general needs homes delivered by most Registered Providers on schemes funded by the Mayor of London are likely to be at London Affordable Rent. Social Rent or London Affordable Rent would be acceptable for the affordable housing units. We await further details on this.

As already stated, we await further details around the intermediate (for sale – shared ownership) units proposed.

Wheelchair accessible units

The Design and Access Statement shows that there will be x5 wheelchair units – these are x1 1B2P flat and x1 3B5P flat in the affordable rented homes, these will be accessible and then there are x1 1B2P and x2 2B3P in the private for sale homes, these will be adaptable. This represents circa 10% of the development. It does not appear that there are any wheelchair M4 (3) units in the intermediate (for sale – shared ownership) homes, it would have been good to have the wheelchair adaptable and accessible units across all tenures. Haringey's position on wheelchair accessible units is set out in *Appendix C– Affordable and Specialist/Supported Housing Guidance* and states that "a minimum of 10% of all affordable homes should be wheelchair accessible, with an aspiration of 20%".

Intermediate Housing Policy Statement

Finally, we would like to draw the applicants' attention to the following requirements relating to the pricing, allocation, letting, and marketing of the intermediate homes:

<u>Pricing</u>

The Council expects providers to ensure that all new affordable homes are genuinely affordable for Haringey residents.

The Council expects that Shared Ownership housing is priced so that net housing costs, including mortgage costs, rents, and service charges, should not exceed 40% of a household's net income.

As such, developers should be aware that Shared Ownership homes should be priced so that households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties will not spend more than 40% of their net income on mortgage costs, rents, and service charges.

To be clear, that 40% threshold relates to pricing and not to allocation and letting.

London Living Rent is required to be set at one third of average local household incomes.

<u>Allocation and letting of London Living Rent and Shared Ownership homes</u>

The Council's Intermediate Housing Policy requires that homes for Shared Ownership and London Living Rent (LLR) are targeted at households with a maximum income of £40,000 for one- and two-bed properties, and £60,000 for larger properties.

Applicants for Shared Ownership must be first-time buyers unless they are purchasing to move into a larger home to meet their household needs.

LLR homes must be limited to applicants with a gross household income of less than £60,000. However, they must be targeted at households with a maximum income of £40,000 for one- and two-bed properties.

The Council is clear that local residents should benefit from new affordable housing and requires the use of priorities and marketing bands set out in the attached policy and summarised below. Developers are asked to note that robust mechanisms will be put in place to monitor and enforce these.

Priorities are set to allocate properties when a number of individuals who meet the eligibility criteria have expressed an interest, and are as follows:

Priority One:
•Haringey social housing tenants, including Housing Association tenants where Haringey has nominations rights to that property
•Households on the housing register
•Households who are required to move because of estate renewal,
•Children of Haringey social housing tenants who are currently living with their parents

Priority Two
•Members of the armed forces
•Applicants who live or work in the borough

Priority Three
•Any other applicants living or working in another London borough.

Where several applicants are in the same priority band, precedence will be given to households on the lowest income who meet the affordability criteria, and then to the applicant who first expressed an interest in the property.

<u>Marketing intermediate housing</u>
The Council sets clear guidelines for the marketing of intermediate products in order to ensure that these priorities are achieved.

The attached Intermediate Housing Policy requires that intermediate housing is marketed in a phased way, with those living or working in Haringey with a maximum annual income of £40,000 for 1 and 2 bed properties and £60,000 for larger properties being prioritised until three months after completion.