

LEB19

**LONDON** LEGACY  
DEVELOPMENT  
CORPORATION

# Local Plan Background Paper: Housing

August 2014



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# 1. Introduction

## The Local Plan

- 1.1 The Legacy Development Corporation became the Local Planning Authority for its area on 1st October 2012. As a result it is required to prepare a Local Plan, which when adopted will become the statutory development plan for its area, setting out the policies and proposals that will be used to guide development in its area and will be used in making planning decisions when determining applications for development.
- 1.2 The National Planning Policy Framework, 2012 (NPPF) requires that local planning authorities set out their strategic priorities for the area including strategic policies to deliver:
  - The homes and jobs needed in the area;
  - The provision of retail, leisure and other commercial development;
  - The provision of infrastructure for transport, telecommunications, waste management, water supply, waste water, flood risk and energy;
  - The provision of health, security, community and cultural infrastructure and other local facilities; and
  - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

## Purpose of this Background Paper

- 1.3 The NPPF requires that Local Plans are prepared using a proportionate, adequate, up-to-date and relevant evidence base “about the economic, social and environmental characteristics of the area”. This background paper draws together and summarises the evidence that has been considered in developing those policies and other aspects of the Local Plan that have regard to housing policy.
- 1.4 The Local Plan draws on the content of the plans affecting the area that were adopted by each of the four Growth Boroughs (Hackney, Newham, Tower Hamlets and Waltham Forest) prior to 1st October 2012 and the evidence prepared support to support these. It is the intention of the Legacy Corporation that its Local Plan draws on these plans and where necessary updates the approach taken and the evidence used in support in preparing its own Local Plan. This paper, therefore, sets the approach to the Local Plan in the context of national planning policy and legislative requirements, the strategic policies and strategy set out in the London Plan and the extant planning policy in the appropriate adopted plans published by each borough.
- 1.5 This background paper is one of several that have been prepared in order to show that the policies within the Local Plan are Justified (i.e. supported by evidence) Effective (i.e. able to be delivered) and Consistent (i.e. in line with national planning policy).

## What is the background and purpose of the Legacy Corporation?

- 1.6 In February 2012 the Mayor of London announced his formal decision to create a Mayoral Development Corporation to be responsible for the regeneration legacy from the 2012 Olympic Games. The Legacy Corporation came into being on 9th March 2012.
- 1.7 On 1st October 2012, the London Legacy Development Corporation (Planning Functions) Order 2012 came into force giving the Legacy Corporation a range of planning functions that would normally be available to a local planning authority, including plan making powers.
- 1.8 The Legacy Corporation also has powers which allow it to become a Community Infrastructure Levy (CIL) charging authority. In becoming a local planning authority the Legacy Corporation has subsumed the planning functions of the Olympic Delivery Authority (ODA), the London Thames Gateway Development Corporation and the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest for the land within its area.
- 1.9 The purpose of the Mayoral Development Corporation is: *“To promote and deliver physical, social, economic and environmental regeneration in the Olympic Park and surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”*
- 1.10 The Legacy Corporation aims to achieve its goals by:
  - Working in partnership with the Mayor of London and the Greater London Authority, Central Government, the Olympic Host Boroughs, residents in neighbouring local communities, local organisations, businesses and regeneration agencies and other partners in both the public and private sector, including national and international sporting, cultural and leisure organisations;
  - Leveraging our public assets to attract and secure private investment for the development of the Park;
  - Setting and maintaining standards for quality of design, construction and urban planning, to ensure a sustainable and enduring legacy for the Park.
- 1.11 Four priority themes have been developed that reflect the purpose of the Legacy Corporation. These are:
  - Promoting convergence and community participation;
  - Championing equalities and inclusion;
  - Ensuring high quality design; and
  - Ensuring environmental sustainability.

## 2. Legislative and policy context

- 2.1 The Legacy Corporation’s planning related powers and responsibilities are primarily drawn from the following legislation:
  - Town and Country Planning Act 1990 (as amended)

- Planning and Compulsory Purchase Act 2004 (as amended)
- The Planning Act 2008 (as amended)
- Town and Country Planning (Local Planning) (England) Regulations 2012
- Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) and other statutory instruments under Part III of the 1990 Act
- Localism Act 2011
- London Legacy Development Corporation (Planning Functions) Order 2012
- The Community Infrastructure Levy Regulations 2010 (as amended)

2.2 The primary sources of policy that will influence the development of the Local Plan are as follows. The National Planning Policy Framework, 2012 which sets out the Governments Planning Policies for England and how it expects these to be applied.

2.3 Borough Adopted Plans. These are the adopted planning policy documents that were in place before 1st October 2012 and remain the relevant local planning policy until such time as the Legacy Development Corporation Local Plan is adopted. These comprise:

- London Borough of Newham Core Strategy (2012)
- London Borough of Hackney Core Strategy (2010)
- London Borough of Hackney, Hackney Wick Area Action Plan (2012)
- London Borough of Tower Hamlets Core Strategy (2010)
- London Borough of Tower Hamlets, Fish Island Area Action Plan (2012)
- London Borough of Waltham Forest Core Strategy (2012)

#### **National Planning Policy Framework (NPPF)**

2.4 The NPPF published in March 2012 aims to streamline the national policy statements to support sustainable development. It sets out the overarching national planning policy requirements which all local planning policies need to be consistent with. It sets out a number of requirements for policies in general but also gives topic-based policies on achieving sustainable development, plan-making and decision-making. In relation to plan-making, in accordance with the requirements of Paragraph 182 of the NPPF, in order to be considered sound, all planning policies need to meet the following ‘tests of soundness’:

- Positively Prepared: the Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified: Overall the policies should form the most appropriate strategy, when considered against other reasonable alternatives, based on proportionate evidence.
- Effective: The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities
- Consistent with National and Regional Policy- the plan should enable the delivery of sustainable development in accordance with the policies within the Framework.

2.5 In relation to topic-specific issues, guidance for housing is provided within one of the three dimensions to sustainable development:

a social role – “supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a

high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being”.

2.6 The NPPF makes clear that local planning authorities should have a robust understanding of housing requirements in their area, and that they should produce local plans, in consultation with people in the local area. Local plans must support delivery of market and affordable housing to meet the needs of their area, unless this would compromise key sustainable development principles. The NPPF asks local councils to plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community, including older and disabled people. The key sections of the NPPF in relation to housing are included within being Section 6, Delivering a wide choice of high quality homes (paragraphs 47 to 53) and Para 159 within the Plan-making evidence base section.

2.7 Paragraph 47 of the NPPF sets out that “to boost significantly the supply of housing, local authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5 per cent (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20 per cent (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.”

2.8 Paragraph 50 of the NPPF sets out that “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the

objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”

2.9 Other housing requirements within the NPPF are: the ability to make a windfall allowance if compelling evidence is available; the requirement to demonstrate a five-year supply of deliverable housing sites (Para 48); how relevant policies shall not be considered up-to-date if a five year supply of housing sites cannot be demonstrated (Para 49); encouraging local authorities to bring back empty houses and buildings into use and should normally approve changes to residential use from commercial (Paragraph 51); and resisting inappropriate development within residential gardens (Para 53).

2.10 Affordable Housing and Affordable Rent are both defined within the Appendix:

*‘Affordable housing: social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision’*

*‘Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require no more than 80% of the local market rent (including service charges, where applicable)’*

2.11 It is also noteworthy that the NPPF removed targets for development on previously developed (brownfield) land and the requirement to have regard to national minimum density for housing.

2.12 Section 159 also sets out the evidence base requirements for housing, stipulating that local planning authorities should prepare a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA). The SHMA should assess the full housing needs, identifying the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. This should meet household and population projections, taking account of migration and demographic change; address the need for all types of housing, including affordable housing and the needs of different groups in the community; and cater for housing demand and the scale of housing supply necessary to meet this demand. The SHLAA should establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.13 This background paper will set out how policies are set to achieve the aims of paragraphs 487 to 51 of the NPPF, but crucially will also demonstrate how housing policies meet the tests of soundness, with detail drawn out against each relevant policy.

#### **Planning Practice Guidance, 2014**

2.14 This sets out how and the methodology behind the assessment of housing needs. It also sets out that these should not be constrained by land availability, or other infrastructure or environmental factors. Housing Market Areas are seen within this guidance as the base of the needs assessments. Crucially it also sets out that local planning authorities should not use primary research to determine housing requirements, instead relying on secondary

research, with household projections, Census and Labour Force Survey data being principal sources of this information.

- 2.15 This guidance also sets out how assessments of housing land availability should be conducted, including a staged approach. It sets out where departure from the guidance approach exists; there should be clear reasons for doing so.

### **Planning Policy for Traveller Sites, 2012**

- 2.16 This document sets out how local planning authorities should make provision for traveller site through assessment of need which should be met through the allocation of sites. Access to education, health, welfare and employment infrastructure from sites is crucial, whilst protecting amenity. It sets out a number of key processes that should be undertaken in assessing need, including traveller community liaison and co-operation.
- 2.17 Planning for traveller sites should be on a similar basis to housing in general, by identifying a five year supply of sites to meet the identified needs-based plot and pitch target; and broad locations for years 6 to 10 and 11 to 15. Criteria should guide allocations where there is an identified need and criteria-based policies for decisions on applications as they arise.

### **Other Relevant National Policy**

- 2.18 As well as changes to the planning system, since 2010 the Coalition Government has embarked on a wholesale reform of housing policy, in an attempt to boost the supply of new housing nationally, and devolve significant new powers to a local level. The reforms have particularly significant implication for affordable housing provision in London.
- 2.19 Department for Communities and Local Government (DCLG) budgets and Council grants have been reduced and as a result a new model of affordable housing provision has been established to meet the housing needs without the reliance on public subsidy or grant. The 'Affordable Rent' Model allows for a higher proportion of delivery costs to be met by borrowing on future rental receipts and existing assets, supported by a rental model that collects higher amounts than conventional affordable housing by charging up to 80 per cent market rent. Focus has shifted from the use of the planning system to ensure availability at a cost low enough for households to afford to one based on eligibility criteria based on local incomes and house prices.
- 2.20 Other important changes to national policy which have implications for the planning system include:
- Social housing tenancies and welfare reform –lifetime tenancies being replaced with flexible tenancies for new occupants of social housing, housing allocations are now decided locally rather than allowing anyone who met the national standard to be eligible for social housing should they wish and the introduction of caps on benefits.
  - Right to Buy – as of April 2012, the discount cap has been increased to 75 per cent nationwide, in order to incentivise tenants to buy their properties.
  - Local incentives to deliver more homes – including the New Homes Bonus (NHB), Neighbourhood Planning and the Community Right to Build



## The London Plan, 2011

- 2.21 While the Localism Act revoked regional strategies, the London Plan remains. The London Plan, 2011, including Revised Early Minor Alterations, 2013 is the overall strategic plan for London, and it sets out an integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London. London local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by London Local Planning Authorities and the Mayor. Draft Further Alterations to the London Plan, 2014 will also become part of the spatial development strategy once changes have gone through examination in public in Autumn 2014.
- 2.22 With particular reference to the housing policies contained within the London Plan, providing Londoners with a genuine choice of decent homes at a price they can afford is argued by the Mayor of London to be the greatest challenge<sup>1</sup>. The London Plan therefore contains a suite of policies to enable Londoners to have a genuine choice of homes that they can afford and which meet the range of requirements. The Legacy Corporation is a Mayoral Development Corporation so will adhere to the parameters of the London Plan in setting out its policies.
- 2.23 Policies in relation to Housing are contained within Chapter 3, which contains a series of policies surrounding affordable housing provision, thresholds and affordable rent changes. Whilst Policy 3.10 defines affordable housing, Policy 3.11 sets out a target for the delivery of affordable homes across London per annum. It also states that 60 per cent of affordable provision should be for social rent and 40 per cent intermediate, with priority for family housing. It stipulates that local planning authorities should set local targets for affordable housing, taking account of a variety of factors including meeting needs and viability. Policy 3.5 which sets out that local planning authorities should incorporate minimum space standards, meet changing needs over lifetimes and be adaptive to climate change. Policy 3.8 states that policies should take account of housing requirements assessed at a local level (through the SHMA) to set policies for housing size and choice. It also sets out requirements for all developments should be built to lifetime homes standards, 10 per cent wheelchair accessible, needs of older persons, larger families, other supported needs student housing, and gypsy and traveller accommodation.
- 2.24 The Revised Early Modifications to the London Plan, 2013 updated the policy position in relation to the National Planning Policy Framework (2012). This further defines affordable housing within Policy 3.10 to include the affordable rent model. This stipulates that affordable housing should meet affordability criteria with regard to local incomes and local house prices. Affordable rented homes should be let by local authorities or registered providers of social housing to households who are eligible for social rented housing. It also makes provision for affordable housing to remain in perpetuity or receipts recycled for future provision.
- 2.25 Draft Further Alterations to the London Plan, 2014 takes into account the further population increases than anticipated within the 2011 Plan as well as decreases in household sizes to include a housing benchmark target for the Legacy Corporation area. Although not adopted at the time of writing, where possible, changes within this have been reflected within the Local Plan itself Other notable inclusions are: requirements for viability assessments and encouragement of conventional housing developers to extend their offer to address the

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<sup>1</sup> Housing SPG Foreword.

need for older persons accommodation; encouraging a more dispersed concentration of student accommodation, and ensuring affordability to the student body; demonstrating how maximising affordable housing within a scheme; and support for the private rented sector. These will be discussed further against each relevant policy topic within this Paper.

- 2.26 Supplementary Planning Guidance (SPG) documents provide further detail on particular policies in the London Plan, and can be useful where: the level of detail is inappropriate for a development plan, for example development briefs, design guides and master plans for areas of intensive change where there is a need for an urgent policy response to an emerging issue. Statements made in supplementary guidance carry less weight than those in development plans when determining planning applications and appeals, but may still be considerations.
- 2.27 The Mayor's Olympic Legacy Supplementary Planning Guidance was published in 2012 and seeks to supplement and apply London Plan policy for the area that has the LLDC area at its heart; it sets out the Mayor's strategic priorities and long term vision for Queen Elizabeth Olympic Park and its surrounding areas.
- 2.28 Also relevant to this Background Paper is the Mayor's Housing SPG, 2012 which sets out guidance for policies relating to housing. It contains guidance in relation to housing supply, quality, affordable housing and specialist accommodation. It also contains detail on a number of London Plan requirements which have been included within the Local Plan, for example residential design standards which are included within Policy BN.4 (residential design) and Policy BN.5 (Inclusive Design).
- 2.29 Other strategies and plans prepared by the Mayor and Boroughs will also be relevant parts of the evidence base for each policy topic area within the Local Plan, for example The Mayor of London's Housing Strategy (2010), the Mayor's Draft Housing Strategy, 2013 & 2014 and Housing Strategies of the growth boroughs.
- 2.30 Sustainable Community Strategies & the Strategic Regeneration Framework: The Sustainable Community Strategies published by each of the boroughs have helped to set the context for their adopted Planning Documents. The wider context is also partly set by the Strategic Regeneration Framework (SRF) which has been published by the Olympic Host Boroughs to link the physical improvements brought about by the Olympics and its Legacy, with the wider socio-economic change in their boroughs, so that the Games are used as a catalyst to fundamentally change the life chances of their residents."<sup>2</sup> This in essence provides the equivalent to a Sustainable Community Strategy for the Legacy Corporation area in developing the Legacy Corporation Local Plan. The SRF draws its objectives together under the concept of 'convergence' which includes three themes:
- Creating wealth and reducing poverty
  - Supporting healthier lifestyles
  - Developing successful neighbourhoods

### **Policy implications from the Spatial Portrait Background Paper**

- 2.31 Affordability is a key policy implication for housing within the Legacy Corporation area. As the Legacy Corporation SHMA identifies needs are far greater than annual delivery this will

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<sup>2</sup> Mayor's Olympic Legacy SPG (July 2012)

continue to be the case, with the private sector taking up some of the surplus demand. Therefore on one level Legacy Corporation needs to maximise the provision of affordable housing, without compromising affordability but on the other make sure the private sector rented market is fit for purpose.

- 2.32 Need for specialist housing accommodation to meet needs of older persons but also the need to provide a range of these forms of accommodation ranging from extra care accommodation and nursing homes. These forms of accommodation fall within C3 and C2 use classes. In accordance with the Mayors Housing SPG, for the purposes of housing numbers, any proposals which are self-contained will be considered to be C3 and therefore are contributing towards housing delivery. Specialist viability models should be used in determining the viability of affordable housing requirements where applicable to older person's accommodation.

### 3. Evidence Base

- 3.1 As shown in Chapter 2, policies relating to housing within this section need to be consistent with the NPPF, particularly paragraphs 47 to 53 and Para 159. Paragraph 159 in particular sets out a number of evidence base requirements, particularly that policies should be based on up-to-date evidence determining the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. This should be within a Strategic Housing Market Assessment (SHMA). A Strategic Housing Land Availability Assessment (SHLAA) should also be produced to make realistic assumptions about site availability, suitability and viability of land to meet identified housing requirements. This crucial evidence, alongside other sources of information in relation to housing policies is set out below.
- 3.2 These policy and evidence base documents have all been reviewed and their findings used to inform the policies within the Legacy Corporation's Draft Local Plan. This will be shown in detail later in this document, alongside other detailed evidence base documents, in relation to the relevant proposed Policy.
- 3.3 Firstly in relation to housing requirements evidence is principally contained within the GLA SHMA, 2013; the four Borough SHMAs; the East London SHMA and the Legacy Corporation SHMA. A Gypsy and Traveller Accommodation Needs Assessment has also been prepared to assess the needs of these communities. Together these combine to provide a full and robust assessment of housing requirements over the plan period.
- 3.4 The London SHMA, 2013 assessed requirements for market and affordable housing across London as a single housing market area. It found that there is an annual requirement for 48,841 homes in London over from 2015/16 to 2034/35. Of these 32 per cent are for affordable rented and 20 per cent intermediate. Around half of this requirement is for one or two bedroom homes, with a great requirement for smaller social rented homes. This report also looked at requirements for specialist housing including students, older persons, families and those with disabilities. This study identifies a particular demand for three bedroom plus family sized housing, especially within the market sector but also high demand for one-bedroom properties within the affordable sectors. This bears a good deal of resemblance to the conclusions of local studies set out below. This study also set out housing requirements of particular groups, for example, older persons, students, people with disabilities.

- 3.5 A similar logic can also be applied to the reliance solely on the London SHMA, 2013; however there is a wealth of other information that provides evidence on housing requirements, as well as specifically commissioned local evidence to supplement this. All of which are set out below.
- 3.6 The East London SHMA, 2010 includes the four growth boroughs but also Barking & Dagenham, the City of London Corporation, Havering and Redbridge. This identified the greatest demand for one-bedroom properties, and the demand for two bedroom properties is largely within the market sector. Demand within the affordable/social rented sector is in favour of larger three and four bedroom properties, followed by one bedrooms. The Borough SHMAs show that there is continued demand for larger family dwellings in the study area, especially for affordable housing. There is also a high requirement for one bed social rented dwellings and within the market sector; a high proportion of the total requirement is for one and two-bed dwellings. In affordability terms, the requirement for affordable housing is significantly greater than planned delivery.
- 3.7 The Assessing the Legacy Corporation's Housing Needs Report, 2013, known as 'SHMA Review' was commissioned to provide the most up to date information on which to develop policies. It reviews and is based upon the conclusions of the Borough SHMAs, the East London SHMA, 2010 and the Greater London SHMA, 2008, and brings these conclusions up-to-date. These documents were all commissioned and completed prior to publication of the NPPF in 2012 and the NPPG in 2014 (between 2009 and 2012), each modelling housing requirements, including tenure and mix, within the framework of the emerging London Plan 2011 but at varying points in time. An update of this evidence is not deemed necessary as, in relation to the housing targets these are based upon the 2013 London SHMA together with the 2013 SHLAA so are up to date and relevant. In terms of housing tenure and mix requirements contained within the Local Plan, for various reasons set out below these are justified, including most notably the strategic nature of the housing delivery within the Legacy Corporation area, the lower existing population of the area and the consideration of London as one Housing Market Area.
- 3.8 The SHMA Review provides an overview of the existing market analysis of housing need and demand and supply; establishes evidence of the likely future requirement for market and affordable housing for the Legacy Corporation area; informs the assessment of housing need and demand in relation to future proposed development; and translates housing need into housing mix requirements.
- 3.9 Appreciation of the strategic context to the area, and the limited base population is also contained within the report. It shows how the limited existing population bears a unique circumstance whereby housing requirements for the area are determined across a wider strategic area than is the norm. It shows how the population has grown in the past against the significant expansion throughout the Plan period. This echoes the strategic role of the organisation, and the fact that housing delivery within the area is to meet broader requirements than can be determined locally.
- 3.10 Analysis of strategic considerations also provides a policy update, taking account of changes to government housing policy which will impact on housing demand. Analysis of benefit and housing cap changes suggests that there may be increased demand within outer London areas; downsizing from larger family social rented dwellings into smaller units; larger properties may become available for overcrowded households with children; demand for

shared accommodation within HMOs and potential for homelessness to rise if private landlords do not accept households with capped rents. This will also have an impact on housing demand trends.

- 3.11 The analysis looked at the constrained capacity based upon 2011 London Plan figures, within each borough, East London and London as a whole. This study concluded that there are high requirements for one and two bedroom dwellings in the market housing tenure, a general requirement for larger affordable housing units and a need for one bed affordable rented dwellings. In affordability terms, the requirement for affordable housing is significantly greater than planned delivery. The fact that the 2013 London SHMA provides complementary findings to the 2013 SHMA Review also means that the conclusions of both studies combine to provide robust evidence in which to ground housing policies.
- 3.12 It is again important to emphasise that housing delivery within the Legacy Corporation area is to meet a proportion of the Growth Borough housing needs i.e. a proportion within their SHMAs; but also strategic, London-wide requirements. This is demonstrated by the fact that all the needs generated within the existing low population of the area itself of around 10,000 are capable of being met through the enhanced housing supply of around 24,000 new homes. The significant level of housing development will therefore also meet a proportion of the needs of the boroughs as well as strategic London-wide requirements.
- 3.13 Therefore the housing needs evidence is proportionate in terms of the use of updating borough specific local housing requirements, but the strategic nature of the housing delivery within the area can be directly linked to the London SHMA findings. Secondly, as London is considered a single housing market, each local planning authority in London need not produce their own SHMA and the London-wide SHMA should suffice to meet requirements of NPPF paragraph 159. Therefore in this case, the London SHMA, 2013 is singularly sufficient to justify the housing requirements, and affordable housing targets for the Legacy Corporation area but the 2013 SHMA Review being supplementary to this provides greater weight to these already upheld conclusions.
- 3.14 This study drew some general conclusions in relation to the LLDC area. It shows that the private rented sector plays a large role in meeting housing need, with Newham, Waltham Forest and Hackney having proportions of people claiming housing benefits within the private rented sector greater than London and national averages. The proportions of those receiving housing benefit and living within the private rented sectors are also expected to increase.
- 3.15 The Legacy Corporation also commissioned BNP Paribas to vary out a number of studies into the viability of the Plan's approach to housing, and cumulative impact of policies. The Affordable Housing Viability Testing, 2013 tested the ability of a range of types of sites to provide varying levels of affordable housing. It used comparison of residual land values to a range of development options and proportions of affordable housing to appraise whether residential development is capable of generating competitive returns and thus whether a scheme is viable. It found that viability varies between individual sites, determined by existing use and existing use value.
- 3.16 The Combined Policy Viability Study, 2013 compared the residual land values of a range of development typologies to their benchmark land value (current use). If a development incorporating policy requirements generates a higher residual land value than existing then it can be judged to not impact on viability. This approach was used across the study where

the combined impacts of policies were assessed, most notably sustainability and affordable housing requirements, and CIL charges.

- 3.17 Other specialist housing requirements have been assessed within Gypsy and Traveller studies. The [GLA Gypsy and Traveller Accommodation Assessment, 2008](#) assessed need for gypsy and traveller accommodation over the whole of London, setting out requirements by Borough. The total requirements for all parts of all four boroughs amounted to between 22 pitches and 79 pitches between 2012 and 2017. The needs projected within this report do not however cover the whole of the plan period.

Table 1- 2008 GTAA needs

Borough	Min need 2007-12	Min need 2012-17	Max need 2007-12	Max need 2012-17
<b>Hackney</b>	8	5	27	7
<b>Newham</b>	7	3	15	4
<b>Tower Hamlets</b>	19	6	33	7
<b>Waltham Forest</b>	-1	3	4	4

- 3.18 The Legacy Corporation also commissioned ORS to conduct a [Gypsy and Traveller Accommodation Assessment, 2014](#) for the LLDC area to update the above position and take account of the requirements of the [Planning Policy for Travellers Sites, 2012](#) requirements. This was based upon standard methodology, identifying a need of between 10 and 19 gypsy and traveller pitches, and between 6 and 10 within the first five years of the plan period. The report contains three scenarios, the first being meeting need arising wholly within the Legacy Corporation area; the second meeting a proportion of Hackney’s waiting list; and the third, albeit unlikely scenario of the re-location of pitches from an existing site within Newham.
- 3.19 In relation to site availability requirements of the NPPF are principally contained within the GLA’s SHLAA 2013, but also is supplemented locally by some information within the [Sites Report, 2014](#). The [GLA SHLAA, 2013](#) assigned housing capacity to a number of sites within the Legacy Corporation area for housing capacity, following sites discounted for policy reasons. Housing capacity was assigned to each site based on a number of assumptions and considerations. Capacity within each site was then developed into overall capacity, shown within four categories: Large Site Capacity; Small Site Capacity; vacant; and non-self contained accommodation. Large sites are further broken down by permissions, allocations and other potential. Where other potential is identified their future capacity is defined in terms of probabilities and expressed only in terms of combined capacity and are not publically identified individually. All these site sources make a total capacity of 14,711 between 2015 and 2025. Further details, including specific methodology can be found on the GLA website.
- 3.20 This information has then been used by the GLA to review annual borough housing targets within the Further Alterations to the London Plan (FALP). The results of this London-wide work have been used to develop an annual housing target for the Legacy Corporation area. The phasing developed within the study have informed housing delivery estimates within the Local Plan, where planning permissions are not present. Further information is contained within Section 4 of this Paper.

- 3.21 As the London wide SHLAA is comprehensive, based upon all potential sites by local planning authority area the Legacy Corporation is not required to produce its own SHLAA. However, the London Plan suggests supplementing this information with further evidence on further identified capacity, which could emerge within potential sites. The Legacy Corporation has taken the view that future capacity will emerge in areas outside sites identified with capacity, but rather than making a windfall allowance, under NPPF paragraph 48, these will be included within the housing trajectory only when planning permission is achieved, so do not need identifying at present. In terms of additional capacity within 'potential' sites, this will be fed into the housing trajectory, when planning permission has been granted, with the remaining capacity within the broad location adjusted.
- 3.22 The Legacy Corporation also conducted its Call for Sites consultation between November and December 2012. This identified a further 34 sites for further consideration. Each of these submissions has been fully assessed against a number of criteria, and relevant policies to determine suitability for allocation. Many of these sites were contained within larger existing SHLAA site polygons; were submitted for other uses, while others fell below the 0.25ha threshold for inclusion.
- 3.23 These sites are contained within the Sites Report, 2014, and analysed in detail. This demonstrates how each site has been identified i.e. within SHLAA, Call for Sites processes or identified by LLDC. Each site is then assessed against the criteria for inclusion as a site allocation, based upon site size, constraints and other strategic considerations. This does not however, assess capacity within the sites, which have been left to site-specific considerations, based upon Local Plan policies. This justifies the allocation of sites within the Local Plan. Further information is contained within the report itself.
- 3.24 Additional assessment of sites to that contained within the Sites Report is included within the Gypsy and Traveller Site Assessment, 2014. This assessed six potential sites for accommodation and found only two with some limited potential. One such site has subsequently been fully discounted because it is not available, and required by LB Hackney. The second site, at Bartrip Street South is in Transport for London (TfL) ownership so is potentially available. This is discussed further within Section 8 of this paper.
- 3.25 There is also additional evidence which supports housing policy. Monitoring information and information within the Authority Monitoring Report, 2012/13 also shows delivery information and trends in relation to more minor applications. This has shown that conversions from other uses to C3 dwellings are a greater than anticipated source of supply, with 119 being created from these developments in the reporting year. This information is also contained within Appendix 2. The approach to housing policy within the Local Plan is also founded upon representations received to consultation periods. All information to be found within the Consultation Report, 2014.

## 4. Strategic Housing Provision

- 4.1 This Strategic policy has been developed from **SP.2: Housing** and aspects of **Policy H.1 Housing Provision** and **H.3 Affordable Housing** of the **Local Plan Consultation Document**. Winter 2013/14 consultation responses in relation to these policies were broadly supportive of the maximisation of housing and affordable housing provision with specific comments on the housing and affordable housing tenure and dwelling size mixes, and the evidence base which is in support. A number commented on the need to maintain existing supply of

housing, including affordable housing; the inability at the time to show a five-year housing land supply plus 5 per cent buffer; and the emphasis upon family housing.

4.2 The over-arching strategic housing policy (SP.2) sets out approach to housing within the area, in particular:

- Setting the annual housing, and affordable housing targets
- How a mix of housing types will be provided
- Providing specialist housing products
- Protecting existing residential properties.

4.3 The NPPF places a number of requirements on local planning authorities when preparing their Local Plans. Para 47 requires that housing policies must demonstrate how meeting full, objectively assessed needs; identify key sites critical to delivery of housing strategy; identify five year supply of deliverable housing sites plus a 5 per cent buffer; broad locations for growth for years 6-10, and where appropriate 11-15; and demonstrate expected rate of housing delivery. This section will demonstrate the housing strategy in relation to these matters.

### Housing provision target

4.4 The housing target has, alike other London planning authorities been determined by the GLA and its SHLAA, 2013. No other options have been considered, as London Plan is over-arching planning strategy and part of the Development Plan for the area. The SHLAA looked at every suitable parcel of land over 0.25ha. Exclusions include Metropolitan Open Land, existing designated industrial land, land required for strategic functions and any site less than 0.25ha. Any site below 0.25ha is included within the assumed small site capacity figures discussed below. It is worth noting that the GLA SHLAA figures are not constrained, i.e. all sites are considered developable so there are no separate figures for constrained and unconstrained housing supply.

4.5 Table 2 shows an estimate of housing delivery within the LLDC area correct as at December 2013, showing how the 1,471 annual housing target has been calculated by the GLA. In accordance with the methodology a site can only be placed within the first 5 years of the plan period if it does not have any issues to be overcome, e.g. multiple ownership etc, and is considered deliverable. Therefore sites with such issues are contained within years 6 to 10 and 11 to 15. The SHLAA contains information for each site which is considered deliverable (years 1 to 5) and developable (years 6 to 15). The capacity figures within the sub-areas at Table 2 below are all sites within the SHLAA which do not currently have planning permission. There are no such sites within Sub Area 2.

Table 2- Estimates of housing delivery from known sites 2013-2031 as at December 2013 (London SHLAA)

Site details	2013/14- 2014/15	2015/16 2019/20	- 2020/21- 2024/25	2025/26- 2029/30	2030/31- 2034/35	Total
<b>Consented schemes (Outline or full)</b>						
St Mary of Eton Church complex, Eastway	0	27	0	0	0	27
East Wick (part of - 1), Queen Elizabeth Olympic Park	0	241	240	0	0	481
East Wick (part of - 2), Queen Elizabeth Olympic Park	0	205	204	0	0	409



Sweetwater, Queen Elizabeth Olympic Park	0	380	380	0	0	760
Chobham Manor, Queen Elizabeth Olympic Park	0	425	425	0	0	850
Stratford City (north of the International Station)	2782	1036	818	818	0	5454
Chobham Farm, Leyton Road	176	622	238	0	0	1036
Queen Elizabeth Olympic Park, North of Aquatics	0	0	786	786	0	1572
Queen Elizabeth Olympic Park, south of Aquatics	0	0	133	0	0	133
Queen Elizabeth Olympic Park, South of the ArcelorMittal Orbit	0	0	480	479	0	959
The International Quarter, Stratford City	0	0	0	334	0	334
Cherry Park, Stratford City	0	276	453	376	0	1105
Site bordering Great Eastern Road and Angel Lane *	0	931 759 (including student bedspaces)	128	0	0	1059
Land at Pudding Mill Lane	0	0	630	630	0	1260
Rick Roberts Way, Stratford High Street	0	0	200	200	0	400
Strand East (Sugar House Lane)	0	852	348	0	0	1200
Bromley by Bow North Site	0	371	370	0	0	741
Bromley By Bow South Site	0	0	150	150	155	455
68-70 High Street, Stratford	0	87	86	0	0	173
Corner of Westfield Avenue, Stratford City*	0	951	0	0	0	951
<b>Subtotal 1</b>	<b>2958</b>	<b>6404</b>	<b>6069</b>	<b>3773</b>	<b>155</b>	<b>19359</b>
<b>Additional estimated capacity by Sub Area -without any consent</b>						
Sub Area 1	0	367	878	857	713	2815
Sub Area 2	0	0	0	0	0	0
Sub Area 3	0	150	72	239	168	629
Sub Area 4	0	0	439	207	105	751
<b>Subtotal 2</b>	<b>0</b>	<b>517</b>	<b>1389</b>	<b>1303</b>	<b>986</b>	<b>4195</b>
<b>Total</b>	<b>2958</b>	<b>6921</b>	<b>7457</b>	<b>5077</b>	<b>1141</b>	<b>23554</b>

\* Student accommodation (951 at Corner of Westfield Avenue and 759 at Great Eastern Road/Angel Lane).

4.6 The annual housing target has been calculated by summing the first 10 years housing supply from committed and uncommitted developments equalling 14,379 plus an estimated 330 from small sites divided by 10 to give an annualised Legacy Corporation target of 1,471. This target is generated from large sites plus small sites plus student non self-contained accommodation within the first 10 years of the plan period:

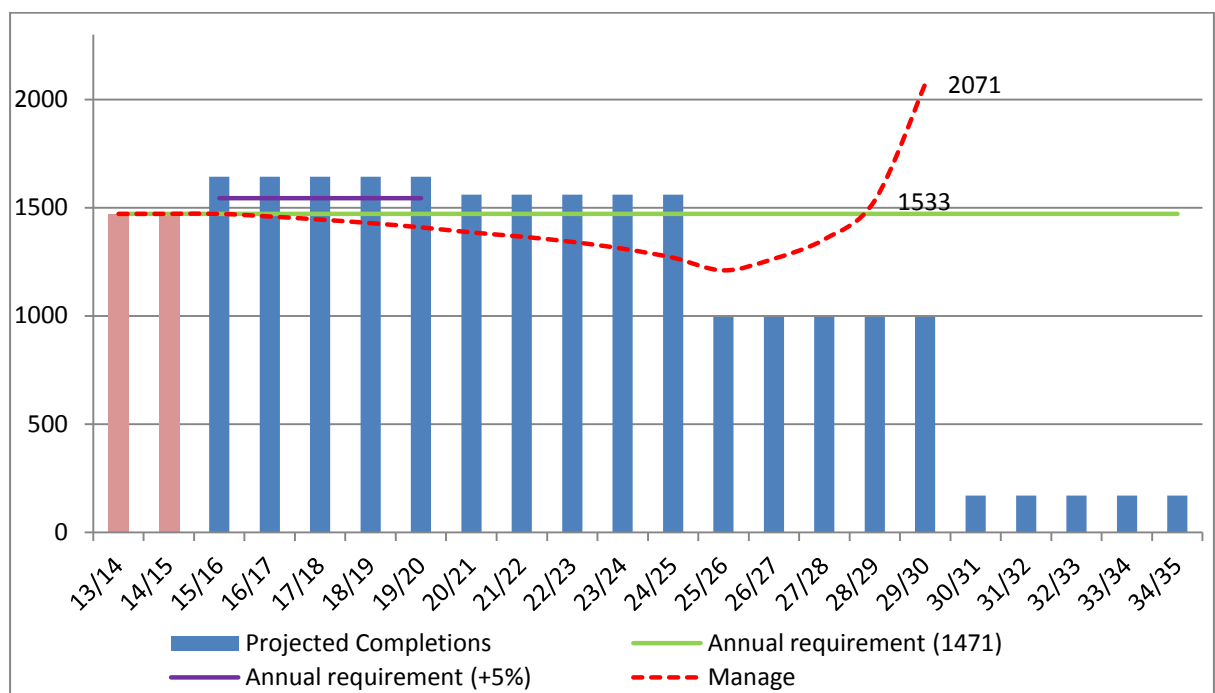
**Large sites + small sites+ student/non-self contained accommodation= housing target**  
**10**

- 4.7 The small site figure above has been estimated by the GLA to provide approximately 33 units per year (calculated over a 10 year period). The GLA has applied the same methodology for calculating borough housing targets across London and therefore this approach is robust.
- 4.8 As discussed above, Table 6 from the SHLAA, correct at December 2013, shows estimates of housing delivery from schemes within the LLDC area. It shows total capacity for 23,554 homes between 2013 and 2031. Within committed schemes capacity for 19,359 homes up to 2031 and 4,195 capacity without consent. Student bedspaces account for all of the development within the Corner of Westfield Avenue, Stratford City development (951) and 759 student bedspaces within the Site bordering Great Eastern Road and Angel Lane. These have been discounted from the analysis in terms of the annual proportion of affordable homes because they are not affordable or self-contained.

### Housing trajectory

- 4.9 Completions information is contained within the Housing Trajectory at Figure 1 and is correct as at July 2014. The housing trajectory is broken down into five year tranches. Due to the numbers of units being delivered in large developments it is not possible to break these down into annual tranches of which units delivered within each year. Therefore these remain in the same phasing periods as within the SHLAA and are therefore 5 year averages.

Figure 1- Housing trajectory



- 4.10 It includes all anticipated sources of supply, and has used live permissions information for the first 5 years of the plan period, reverting to the small sites estimate of 33 per annum for latter years. As well as showing completions against the annual requirement, Figure 1 shows the 'manage' approach. This line shows that annual number of completions required to meet the housing target over the whole of the plan period on a year by year basis, taking account of past delivery rates. This shows that the cumulative annual target will be met in total up until 2028/29 onwards. Therefore cumulatively, it is only in the last two years of the plan period when delivery will fall below expected cumulative levels. The full table showing the

breakdown of figures using their planning permission as a reference point, and an example of how the 'manage' line has been calculated are shown in Appendix 2.

- 4.11 Paragraph 47 of the NPPF requires that a 5 year land supply is maintained plus a 5 per cent buffer to ensure choice and competition in the market. If this is calculated on the basis of the above, this amounts to 74 per annum making a total requirement of 1,545 per annum. Figure 2 shows that the 5 per cent buffer will met for the first 5 years of the Plan period, but it may not be possible on a rolling five year basis. Delivery is understandably less certain for the last five years, however London Plan targets will be reviewed by 2019/20. Para 3.19a of the London Plan recognises the difficulty of this approach, and how windfalls can be used as a genuine source of housing capacity. Nonetheless, Figure 1 shows that the cumulative housing target is expected to be exceeded with over 24,000 homes delivered over the plan period, through additional capacity than estimated within the SHLAA and small site windfalls. There will also potentially be a very minor source of supply from re-use of vacant properties.
- 4.12 Another potential source of additional supply is greater than anticipated delivery on sites within a wider SHLAA site. For example permissions granted in November 2013 at Neptune Wharf and Monier Road will deliver more than expected levels of housing, the former providing 171 additional units additional than estimated for this proportion of the site within the SHLAA. For this purpose the trajectory has apportioned this as additional capacity based upon the density estimation within the SHLAA. The Legacy Corporation is aware that delivery over large parcels of land could balance itself out to SHLAA proportions, but in general the SHLAA is seen as a conservative estimate, so additional capacity is considered an appropriate response.
- 4.13 In relation to small sites as a potential source of housing, as stated above the GLA has allowed for 33 units per annum. The Legacy Corporation considers this to be an under-estimation in the short term; with a lesser degree of certainty for medium to long term. Extant planning permissions for approximately 972 units within small sites of less than 0.25ha (shown in Appendix 2) make an annualised small site total of 171 units per annum, considerably above the 33 GLA estimate. Of these, 119 units have been delivered between 2013/14 and 2014/5, and the remainder will be expected to be completed within the first 5 years of the plan period. The 33 units per annum small sites figure have therefore not been added to the housing delivery within the first five years of the housing trajectory so there is not expected to be any double-counting. Due to land availability, this trend is not expected to be sustained over the plan period so should not be factored into the housing target.
- 4.14 The Housing Trajectory and the key sites which sit behind this will be updated annually within the Authority Monitoring Report (AMR). The five year housing land supply figure will rely on extant permissions for the small sites figure. The 33 units per annum figure will only be introduced within years 6 to 15, where this delivery is less quantifiable. More detail is provided within Appendix 2.
- 4.15 Accelerated delivery on identified sites may not provide any additional housing capacity within the Plan Period it does help demonstrate how the 5 per cent buffer can be met in the short term. For example East Wick and Sweetwater is now due to come forward in 6 years earlier than planned. This obviously boosts the housing supply in the short term, with some implications for the latter periods.

4.16 In terms of the final potential source of supply: reuse of vacant properties, the Legacy Corporation does not have a GLA-set proportion for this source. It is anticipated that, discounting the Carpenters Estate which has been taken account of in the SHLAA due to the nature of the area, the supply of dwellings from bringing long term vacant back into use is minimal. Therefore this is not included as a potential source of supply.

### Key housing sites

4.17 Appendix 2 shows the sites that make the housing trajectory, and is split into five year tranches post adoption. As required by Para 47 of the NPPF the Legacy Corporation has identified these key sites and 5 years worth of sites to meet the supply, plus the buffer, as discussed above.

4.18 The key sites crucial to the delivery of the housing strategy over the Plan period all have planning permission and are proposed for allocation within the Plan. Cumulatively these large strategic sites account for 16,178 new homes which amount to over 11 years of the 15 year housing supply:

Table 3- Key Housing Sites

Site	Application and numbers
Stratford Town Centre West	07/90023/VARODA– 6,664 homes across five zones; 10/90285/FUMODA- 248 homes
Sweetwater	11/90621 Legacy Communities Scheme- 6,729 homes across seven Zones
East Wick	
Chobham Manor	
Stratford Waterfront East	
Stratford Waterfront East	
Pudding Mill and Bridgewater Road	
Rick Roberts Way	
Chobham Farm	12/00146/FUM - 1036 homes
Sugar House Lane	12/00336/LTGOUT - 1,200 homes
Bromley-by-Bow	11-070-FUL/PA/02423- 741 homes

4.19 Other large schemes with planning permission shown below cumulatively deliver almost 3,900 units. Some of which are also contained within wider site allocations:

- 12/00210/OUT- Neptune Wharf (Allocated)
- 13/00204/FUM- Monier Road
- 13/00275/VAR- Angel Lane
- 10/02291/FUL- 2-12 High Street
- 12/00221/FUM- Site bordering Great Eastern Road and Angel Lane
- 11/90619/FUMODA- Porsche Garage, 68-70 High Street, Stratford
- 11/90618/FUMODA- Corner of Westfield Avenue, Stratford City
- NEWCON/07/00026- Station House
- 06/90011/FUMODA- Stratford Edge , 80-92 High Street
- 13/00404/FUM- Alumno, 206-214 High Street.

4.20 The remaining housing capacity will come over from identified capacity for each sub area (Sub Area 2 has no apportioned additional housing capacity as most land contained within the large strategic sites) and from changes of use and conversions. The following site allocations within Sub Area will also contribute towards this capacity:

- SA1.1: Hackney Wick Station Area
- SA1.2: Hamlet Industrial Estate
- SA1.3: Hepscott Road
- SA1.4: Bream Street
- SA1.5: 415 Wick Lane
- SA3.4: Greater Carpenters District

Table 4- Additional capacity

Sub Area	1	2	3	4	Total
Number	2334	0	629	1206	<b>4169</b>

4.21 All the varying sources of housing capacity have been broken down further into years 1-5 of the Plan Period where sites need to be 'deliverable'; and years 6-10 and years 11-15 where they need to be demonstrably 'developable' to meet NPPF requirements. These are shown within the following sections.

### The five year housing land supply

4.22 As shown above the first five years of housing delivery amounts to **7723** units which includes the 5 per cent buffer (i.e.  $1471 \times 5 + 5\%$ ). It is not considered that a 20 per cent buffer is necessary as there is no history of consistent under-delivery. This section will show the sites considered deliverable within the first 5 years of the plan period and thus enable this target to be met. There is no backlog to consider.

4.23 Appendix 3 shows the status of all sites identified within the five year housing land supply. This identifies 6 sites under construction, as at July 2014. As they are already on site and commitment for units completed before 2020/21 then they are valid for inclusion. These sites amount to **4197** units which amounts to 2.72 years worth of housing supply (including 5 per cent), and are shown in further detail within Appendix 3:

- Legacy Communities Scheme Zone 6- Chobham Manor
- Stratford City Zone 2- The International Quarter
- Stratford City Zones 3-5
- St Mary of Eton Church
- Site bordering Great Eastern Road and Angel Lane
- Corner of Westfield Avenue, Stratford City
- Station House

4.24 The remaining sites identified within the first five years of the housing trajectory are below. Each of these sites have been extensively assessed to determine their deliverability within 5 years against the tests within Para 47 and footnotes of the NPPF. This has included assessment of site-specific commitments and considerations, including through engagement with landowners and developers, infrastructure delivery requirements and other constraints which could impact on delivery timescales. Together these sites amount to **3867** units. Full details are also shown within Appendix 3.

- Legacy Communities Scheme Zone 4- Sweetwater
- Legacy Communities Scheme Zone 5- East Wick
- Stratford City Zone 1- Cherry Park

- Manhattan Lofts
- Strand East (Sugar House Lane)
- Bromley by Bow North Site
- 2-12 High Street
- Porsche Garage, 68-70 High Street, Stratford
- Neptune Wharf
- Monier Road
- Stratford Edge , 80-92 High Street
- Alumno, 206-214 High Street

4.25 Taking these two site groupings together this makes a total of 8064 units, to be delivered within this period. This exceeds the target by on average 142 per annum, which makes a buffer of almost 10 per cent.

4.26 There is a reasonable degree of certainty that these sites will come forward as described. The first two sites above are within Legacy Corporation ownership, and amount to almost 764 units. Other sites, not currently under construction carry a greater risk, however through detailed knowledge of the sites and landowner engagement inclusion within this supply is deemed reasonable. Even taking an extremely conservative estimate, by combining sites under construction and delivery within Legacy Corporation ownership makes an estimated delivery of 4961. Therefore to meet the 5 year housing target of 7355, an additional 2394 units need to be delivered from a potential of 3076. Therefore the Legacy Corporation can afford for 22 per cent, or 679 of these units not to come forward, and still be able to meet the 5 year housing target.

4.27 The Legacy Corporation believes this to be a reasonable, evidence-grounded estimate of housing provision within the first 5 years of the Plan period. So it is reasonable to presume that even if an allowance is made for some of this provision to not come forward, the housing target, and the 5 per cent buffer, will still be achieved. Housing delivery will be monitored closely within the Authority Monitoring Report, and measures put in place, should delivery fall below the target.

4.28 Paragraph 48 of the NPPF sets out that Local planning authorities can make an allowance for windfall sites within the five year housing land supply where compelling evidence is provided. For a number of reasons the Legacy Corporation has not opted to do so. Firstly no history of provision due to length of organisation; and sites tend to be within large sites which will be included within the trajectory where permission has been granted. The GLAs small site estimate is included within years 10 onwards, where less certainty regarding particular developments can be gained. However, it is anticipated that this 33 per annum estimate will be met and exceeded on an annual basis.

### Developable sites (Years 6-10 and 11-15)

4.29 With regard to the medium and long term delivery of sites, the following is a summary of what is expected to come forward within these periods. Full details regarding the sites developable within years 6 to 10 and 11 to 15 are contained within Appendix 4.

4.30 The following sites will be the specific **developable** sites for years **6 to 10**, amounting to 5,876 units:

- Legacy Communities Scheme- Zones 1, 2, 4, 5, 6, 8 and 12.
- Stratford City- Zones 1, 3 and 5
- Chobham Farm
- Strand East (Sugar House Lane)
- Bromley by Bow North Site

- Contribution of Angel Lane towards Angel Lane/Cherry Park
  - Neptune Wharf
- 4.31 Broad locations which will make up the potential housing supply for years 6 to 10 are shown below, and are expected to make supply of approximately 1,750 units. These wider areas also contain some site allocations which should also help facilitate these sites to come forward within this 5 year period. As suggested within the London SHLAA, as forming part of the 10 year land supply the Legacy Corporation considers the following as potential sites for the delivery of some housing capacity within this time-period:
- Hackney Wick and Fish Island (SA1.1; SA1.5; parts of Fish island Mid and North)
  - Bromley-by-Bow South (SA4.1)
  - Parts of Pudding Mill (SA4.3)
  - South of Sub-Area 3 (SA3.6)
- 4.32 As described above, the GLA small sites estimate of 33 per annum can be added to this total to make a total expected delivery for years 6 to 10 of around 7,800 units. This is equal to approximately 5.3 years worth of supply (not including 5 per cent).
- 4.33 As before, where the site is within the Legacy Corporation ownership there is great certainty that the site will come forward as suggested. The phased Stratford City permission also carries a great degree of certainty. An early phase of the Chobham Farm development is under construction so has a great degree of certainty. Other sites are less certain but again through liaison with landowners and developers it is expected that these will come forward as suggested. The remaining capacity comes from broad locations, but landowner interest suggests this is achievable.
- 4.34 The following sites will be the specific **developable** sites for years **11 to 15**, amounting to approximately 3,271 units:
- Legacy Communities Scheme- Zones 1, 2, 8 and 12.
  - Stratford City- Zones 1, 3 and 5
- 4.35 Broad locations which will make up the potential housing supply for years 11 to 15 are shown below, and are expected to make supply of approximately 1,540 units:
- Hackney Wick and Fish Island
  - Parts of Pudding Mill
  - South of Sub-Area 3
  - South of Sub Area 4
  - Stratford High Street and environs
- 4.36 Together these locations, amount to approximately 4,050 units. Once the small sites estimate has been added this makes a potential supply of approximately 5,000. This is equal to approximately 3.4 years worth of supply (not including 5 per cent).
- 4.37 Again as above, many of the above sites are within Legacy Corporation ownership and thus great certainty of the site com forward as suggested. The phased Stratford City permission also carries a great degree of certainty. The remaining capacity comes from broad locations, but landowner interest suggests this is achievable.
- 4.38 These locations for years 6 to 10 and 11 to 15 are considered developable for a number of reasons shown below. Further information is shown within Appendix 4.
- Site in LLDC ownership and with a phased planning permission

- Site in LLDC ownership and proposed for allocation
- Site is available and has a phased planning permission (with initial phases already implemented)
- Site is available, has planning permission and developer commitment to proceed
- Site is available and has developer commitment to develop
- Locations where redevelopment pressure is high
- Locations where redevelopment pressure is high and landowner commitment

### Affordable housing target

- 4.39 Policy 3.11 of the FALP specifies that the affordable housing target can be as an absolute or percentage, based on requirements, the overall housing provision target, capacity, need and viability. The Legacy Corporation has set a minimum target of 455 which has been calculated by the following formula:

$$\frac{((\text{Years 1 to 5} + \text{Years 6 to 10}) + 330) - \text{Student Bedspaces} \times 35\%}{10}$$

- 4.40 This is worked out as 6,921 + 7,457 + 330 (from small sites) minus student bedspaces of 759 + 951 divided by 10 years multiplied by 35%. This amounts to 455 affordable homes per annum and is therefore the target. The small site estimate has been included within the target because historically schemes on sites of over 0.25ha have delivered well in excess of the 10 unit threshold, and therefore will be subject to the affordable housing requirements.
- 4.41 The SHMA Review, 2013 sets out that 100 per cent of the housing requirement would need to be affordable to meet overall needs; however this is not considered practical or viable. The 35 per cent target has been used to set the affordable housing target which was in turn determined by the evidence between the Affordable Housing Viability Testing, 2013 and Combined Policies Viability Study, 2014. Student accommodation has been discounted from the target because this is not expected to deliver affordable housing on a regular basis, in accordance with FALP paragraph 3.53b, only where not secured by S106 or linked to HEI, there is no defined 'affordable student' product and the expected non-delivery on these sites could place pressure on other sites to deliver this quantum. For more information on the evidence relating to the 35 per cent affordable housing target see below in relation to Policy H.2.

### Delivery rates

- 4.42 The Legacy Corporation has only had planning powers since October 2012 therefore longstanding delivery trends for the area as a whole are not possible. However, the housing trajectory at Figure 1 shows expected delivery rates for all housing, of which 35 per cent are expected to be affordable. This amounts to 6825 units from 2015 to 2025.
- 4.43 Using the estimated delivery data contained within the Housing Trajectory, there is estimated delivery of approximately 13,877 self-contained units within the first 10 years of the Plan period (which excludes student accommodation). Applying a 35 per cent benchmark to this, would mean delivery of 4857 affordable units. In order for the annual target of 455 to be met over the ten year period, i.e. 4550, 35 per cent of 13,000 housing units would need to be delivered. As delivery is greater than this, it is expected that the annual target



can be met, with some allowance for some sites not coming forward or site-specific issues meaning the affordable housing proportion is lower than 35 per cent on some schemes. Breaking this down by the 60/40 threshold, the 4550 units would amount to 2730 affordable rented and 1820 intermediate.

### Protection of residential

- 4.44 Policy SP.2 also affords protection of residential land and buildings, with the aim of preventing the loss of units unless plans are in place for redevelopment at equivalent or higher density.
- 4.45 The London Plan also specifically protects residential within Policy 3.14. Due to the nature of the area, and the new development coming forward this is likely to be less of a problem than areas with older stock. However within the newer, flatted developments an issue could be the loss of residential units to short term lets, which is protected under the Greater London (General Powers Act) 1973 and thus should be prevented within the Legacy Corporation's area. Another issue could be the loss of larger, family homes within C3 units to HMOs under Use Class C4. This Policy SP.1 of the Local Plan therefore aims to protect this local stock, maintaining a balance of tenures, also meeting the objectives of London Plan Policy 3.9 in terms of mixed and balanced communities.
- 4.46 This section has shown how the housing and affordable housing targets have been developed, principally from Greater London Authority methodology, and the evidence-based affordable housing proportion of 35 per cent.

### *Soundness test summary*

- 4.47 The approach is justified by the evidence of housing need and need for a range of housing types identified within the SHMA Review, 2013 and London SHMA, 2013, and is the most appropriate strategy when considered against the alternatives. These studies were prepared in accordance with SHMA Guidance 2007, many of the principles of which have been taken forward into the Planning Practice Guidance, 2014.
- 4.48 There are no alternatives in terms of the housing target as this is set out by the GLA; nor any alternative to maximisation affordable housing provision required by London Plan Policy 3.3. Although alternatives in relation to how the affordable target is demonstrated may not specifically affect whether is maximised, efficacy of monitoring of the policy could be greater with a specific quantum in mind. These options would be non-inclusion of small sites within the target which are likely to yield some affordable housing, or the inclusion of non-self contained accommodation, most likely to be in the form of student accommodation which is unlikely to yield affordable housing. There may be some limited potential impacts through the second bullet of H.2 in terms of considering past delivery rates.
- 4.49 Options which were not in accordance with national and regional policy were not considered further, such as not setting out policies to meet identified specialist housing requirements, providing a range of types and forms of accommodation, or not safeguarding existing residential accommodation which would also counteract the aims of the rest of the policies to maximise housing provision. Therefore the adopted approach is also effective in its aims of maximising housing supply, and provision of a range of housing types. There are no alternatives available to the setting of an annualised housing delivery target as this is contained within London Plan policy. However, an alternative approach to the policy is the maximisation of housing delivery with prioritisation of housing over other uses in most

locations. While this would maximise the delivery of housing, it would fail to meet the economic and employment objectives set for the area within the Strategic Regeneration Framework and the vision and objectives for the plan.

- 4.50 The policy is also consistent with national and regional policy in terms of being in line with the NPPF and London Plan requirements, particularly that the Legacy Corporation has a five-year housing land supply, as well as at least a five per cent buffer of sites. It sets out the general approach to housing which also meets all NPPF requirements in terms of affordable housing and housing mix.

## 5. Housing Mix

- 5.1 The approach to housing mix has been developed from aspects of **LPCD Policy H.1 Housing Provision**. Winter 2013/14 consultation responses in relation to these policies questioned the mix in relation to the evidence base, and the emphasis upon family housing.
- 5.2 It takes into account requirements of the NPPF and the London Plan, but also the relevant evidence. Evidence is provided by the SHMA Review, 2013, the 2013 London SHMA and the SHMAs of the Growth Boroughs.
- 5.3 Paragraph 50 of the NPPF requires that Local Plan housing policies must deliver a wide choice in housing provision through a housing mix based upon housing trends; in particular locations; and meeting affordable housing needs on site. This section will demonstrate how these requirements have been met, based upon up-to-date available evidence. Policy 3.8 of the London Plan also ensures Londoners have a choice of homes they can afford and their size requirements met. Housing requirements should be assessed to identify the range of requirements within each area. Affordable family provision has specifically been identified as a requirement across London.
- 5.4 As discussed above, the SHMA Review, 2013 alongside the London SHMA, 2013 is robust evidence on which to base housing mix policy. The SHMA Review has shown that there is a great demand for market and affordable housing across the area and high demand for the following types of housing size:
- 1 beds within market and affordable rented
  - 2 beds in market housing
  - Larger units (of 3 bedrooms or more, particularly within affordable sector).
- 5.5 The conclusions of the London SHMA, 2013 set out the net annualised housing requirement for the whole of London over the period 2011/12 to 2034/35. This is based on household growth, affordability and backlog clearance over 20 years, by tenure and number of bedrooms, and is demonstrated within the table below, adapted to reflect 3 bed and larger properties within the same category.

Table 5- London SHMA, 2013 net demand (adapted)

Tenure	1 bed	2 bed	3 bed +	TOTAL	Percent
Market	2,798	5,791	14,628	23,217	<b>48%</b>
Intermediate	3,357	2,240	4,305	9,902	<b>20%</b>
Affordable/Social rent	10,225	1,003	4,494	15,722	<b>32%</b>
<b>TOTAL</b>	<b>16,381</b>	<b>9,034</b>	<b>23,427</b>	<b>48,841</b>	<b>100%</b>
<b>Percent</b>	<b>34%</b>	<b>18%</b>	<b>48%</b>	<b>100%</b>	

5.6 This shows that across London as a whole there is a particularly high demand for three bedroom plus properties. Greatest demand within the market sector is also for three bedroom properties; however within the affordable sector this is for one bedroom properties ahead of three bedrooms. There are many similarities between the London SHMA and local evidence. This justifies the approach of using both studies to develop and approach to housing mix which adapts to local circumstances and site-specific proposals rather than setting out a clear percentage requirement. Alike local studies, demand for two bedroom properties across London is greater within the market than affordable sectors.

5.7 It is also useful to make comparisons between the local requirements within the SHMA Review and the London SHMA, 2013. As shown within Table 6 below, within London the greatest proportion of the demand is for three-bedroom market properties followed by social rented one-bedroom properties. This is in line with the findings of the SHMA Review in terms of demand for one bedroom and three-bedroom properties, indeed the next greatest proportion of the demand is for two-bedroom market properties which were also identified to be in high demand within the SHMA Review. This demonstrates that the findings of the SHMA Review are in line with the conclusions of the London SHMA so are robust and up-to-date.

Table 6- Borough SHMA demand proportions

Bedrooms	Hackney			Newham			Tower Hamlets			Waltham Forest		
	1	2	3	1	2	3	1	2	3	1	2	3
Market	6%	55%	10%	3%	3%	9%	17%	10%	7%	4%	5%	9%
Intermediate	15%	-1%	-11%	33%	1%	18%	8%	17%	8%	11%	15%	10%
Social/Affordable rent	15%	1%	8%	33%	-12%	11%	10%	8%	15%	14%	13%	19%

5.8 Breaking down the demand further to make comparisons between the borough SHMAs and the conclusions of the London SHMA within Tables 6 and 7 also show some similar conclusions. There are some differences between the boroughs, where demand for two bedroom market properties is greatest within Hackney; Waltham Forest and Newham have greater demand for proportions of affordable accommodation in general and demand within Tower Hamlets is more even across size and tenure. The housing mix across the area has not been broken down by constituent borough as Legacy Corporation area is also delivering strategic demand, and land proportions within each borough also vary significantly.

5.9 Combining the total borough requirements from their SHMAs against that of London as a whole within Table 7 shows that the strategic and local demand for 1 bedroom affordable dwellings mimic each other, however locally the second greatest proportion is for two bedroom market properties, while strategically this is for three-bedroom market family homes. The next greatest demand both locally and strategically is for three bedroom

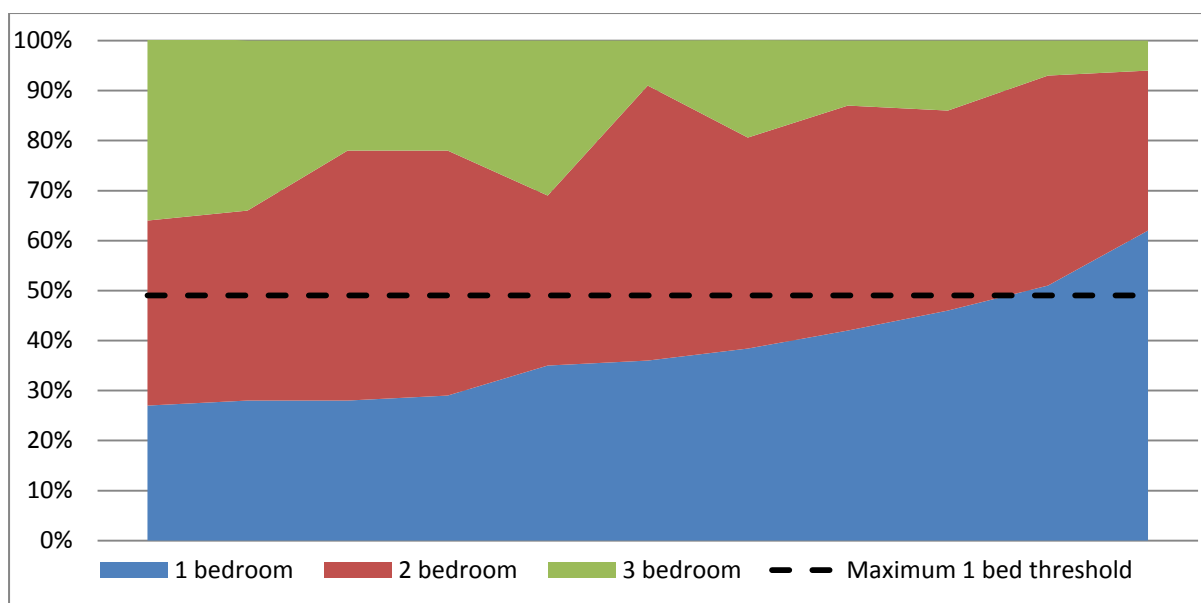
affordable rented family homes.

Table 7- Local and Strategic demand proportions

		Market	Intermediate	Social/Affordable rented	Combined demand (%)
<b>Borough SHMAs</b>	1	7.3%	16.7%	18.3%	42
	2	18.4%	8.0%	2.8%	29
	3+	8.8%	6.5%	13.2%	29
<b>London SHMA, 2013</b>	1	5.7%	11.9%	30.0%	48
	2	6.9%	4.6%	8.8%	20
	3+	20.9%	2.1%	9.2%	32

- 5.10 The SHMA Review assessed the strategic requirements within the 2008 London SHMA and local authority SHMAs. Since this date the GLA has published an update of its SHMA in 2013. This does not render the SHMA Review out-of-date because the conclusions of the 2008 and 2013 London SHMA are similar in terms of demand for three-bedroom properties being high at around 30 per cent of all demand. This demand has been incorporated into the dwelling requirements identified within the policy text, but the policy also maintains flexibility to be assessed on a case-by-case basis.
- 5.11 With regard to intermediate housing mix, the local and strategic evidence has not identified a particularly different requirement to that of other tenures, with demand for one bedroom properties being greatest locally and strategically. This evidence has driven the policy approach. Precise dwelling split demands provide certainty for developers however have not been set in this instance because these would by definition err towards local or strategic requirements when one of the principal roles of the organisation is to provide for both. The requirement for over half of units to be above two bedrooms is appropriate for local and strategic requirements will therefore enhance flexibility.
- 5.12 Therefore Policy H.1 stipulates that two and three bedroom homes should form a greater proportion of the supply than one-bedroom properties, which is in line with the combined demand figures above. This will also prevent the over-provision of one-bedroom properties on the basis of these demand forecasts. It also requires that the housing mix requirements set out within the SHMA Review, which reflects to conclusions of both local and strategic housing requirements should be applied but in a flexible manner, taking into account other site-specific considerations. These considerations include location, viability and the need to maintain mixed and balanced communities.
- 5.13 Figure 2 below shows a sample of some of the housing mixes which have been achieved within the area. It shows that generally there is a good split between the varying property sizes. A majority of the schemes have achieved proportion of one beds which are less than 50 per cent which would meet the minimum aims and criteria of Policy H.1. When weighed up against the evidence it shows that delivery of larger, family-sized properties has been lower than estimated demand. Policy H.1 aims to counteract this by requiring developments to reflect the demand set out above and within the SHMA Review.

Figure 2- Examples of housing mix achieved



5.14 Other aspects of Policy H.1 aim to deal with the creation of mixed and balanced communities and appropriate design and density. Where the proposal could have a negative impact on this in terms of creation of mono-tenure estates, an over-concentration of a specialist form of accommodation, leading to potential harm to residential amenity, character or function of the area, additional justification of the need for this accommodation shall be sought. This will be through marketing information, waiting list, business cases for the development and information on how this proposal is required to support economic functions of the business. The dwelling size split should also show how this contributes to the aim of mixed and balanced communities as set out within the London Plan Policy 3.9. Provision of three bedroom plus units would meet demand in the private sector from families, and those living together as a household, but also within the affordable sector.

5.15 The density matrix within the London Plan provides clear guidance, but densities within the LLDC area are typically high. PTAL levels being strong determinants of density alongside design criteria. Density guides are contained within the London Plan Residential Quality Density Matrix. This remains a good guide to appropriate densities according to location and PTAL level. However, further policy guidance is provided within each of the four Sub Areas, so it is not deemed necessary to re-iterate this within this policy.

5.16 Design principles are referenced within Policy H.1 but are also dealt with via BN.4: Designing residential schemes. The Mayor’s Housing Supplementary Planning Guidance (November 2012) also provides some additional detail to how local planning authorities should plan for housing, which is cross-referenced within each policy.

**Soundness test summary**

5.17 This policy approach is based upon sound evidence contained within the Borough SHMAs, the SHMA Review and the London SHMA, 2013 which all identify that there is a demand for a balanced mix of housing types between all tenures, with particular demand for larger dwellings. Policies are based on an up-to-date and proportionate evidence base. Although aspects of the SHMA Review determined by the 2008 London SHMA have been superseded by a more up-to-date study, the conclusions remain valid for determining local and strategic

housing mix requirements and conclusions are broadly aligned. A number of alternatives have been considered including setting out more precise requirements, but this would fail to meet both the strategic and local role of the organisation.

- 5.18 The policy will be effective in meeting its aims of providing a suitable mix of housing types, with a larger amount of two bedroom or more properties, but also will have flexibility in terms of local site circumstances. It will be deliverable through this flexible nature, which has also been taken into account in viability studies and found to be broadly deliverable throughout the plan period. The approach is also consistent with national and regional policy in terms of the requirement to set out policies how needs for different forms of housing types have been met, but it is also consistent with the London Plan in terms of meeting identified strategic housing size requirements.

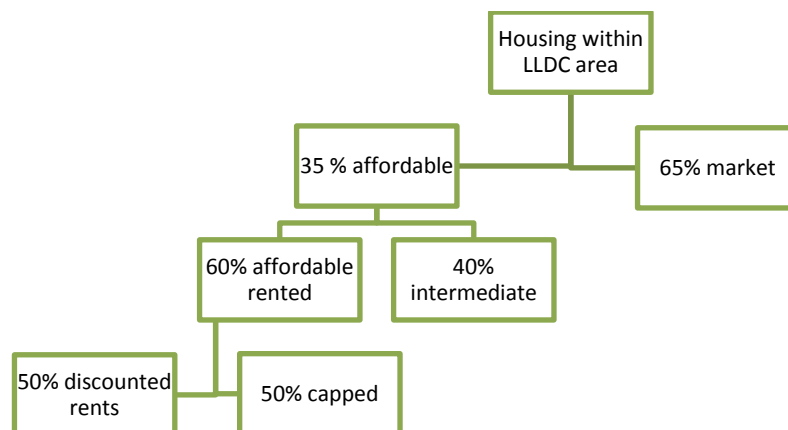
## 6. Affordable Housing

- 6.1 The approach to affordable housing has been developed from the **Policy H.3: Affordable Housing** from the **Local Plan Consultation Document**. Winter 2013/14 consultation responses in relation to these policies requested clarity on the proportion of affordable housing which should be justified by viability and need evidence, but were supportive of the flexible approach. A number also commented that the homes are unaffordable to local people.
- 6.2 It takes into account requirements of the NPPF and the London Plan, but also the relevant evidence provided by the SHMA Review, 2013, the 2013 London SHMA and the SHMAs of the Growth Boroughs. The approach to affordable housing is also supported by the findings of the Affordable Housing Viability Testing, 2013 which tested the viability of emerging affordable housing policies and the Combined Policies Viability Study, 2014 which assessed the cumulative impacts of the local plan policy requirements on development across the area.
- 6.3 The NPPF's requirements in relating to affordable housing are that full, objectively assessed needs are identified and met. In particular Paragraph 159 requires that housing needs are assessed through a SHMA which should meet population projections, address the need for all types of housing, including affordable housing. Paragraph 50 requires that where affordable housing requirements are identified, these needs are met on site.
- 6.4 London Plan policy requirements in relation to affordable housing are set out within policies 3.10 to 3.12. Policy 3.10 defines affordable housing in a London context, including definitions for affordable rented and intermediate housing. Policy 3.11 specifies that 60 per cent of affordable homes throughout London should be affordable or social rented, and the remaining 40 per cent intermediate sale or rent. Policy 3.12 states that affordable housing should be provided on-site unless exceptional circumstances exist. This is taken account of within Local Plan Policy H.3. Other housing policies within the London Plan set out design principles of housing development. Other relevant policies and strategies are set out within the Draft Mayor's Housing Strategy, 2014. This sets out how the delivery of different tenures should be broken down further. It determines that of the 60 per cent affordable rented within the affordable housing target; half should be 'capped' rents for those in greatest need, and the other half 'discounted' at up to 80 per cent of the cost of market housing. The remaining 40 per cent of affordable housing provision should be various models of low cost home ownership. This approach will be adopted by the Legacy Corporation.

- 6.5 The London SHMA 2013 sets out how there is an annualised requirement for 15,722 affordable/social rented dwellings, and 9,902 intermediate dwellings across London, which equals 25,624 affordable homes. The tenure split between the two being 61:39 in terms of need, which shows that the tenure split of 60:40 as set out within London Plan Policy 3.11 is still appropriate.
- 6.6 The SHMA Review, 2013 set the tenure demands within each borough from both the East London and their own specific SHMA. Using the proportions within the East London SHMA in terms of numbers this amounts to 48,080 units taking account of levels of housing demand contained within the 2011 London Plan, and an affordable rented: intermediate split of 51:49. It also sets out demand from each of the borough SHMAs where the tenure split varies from over 80 per cent affordable/social rented to 61 per cent intermediate, and demand levels amounting to a total of over 40,000 for the Growth boroughs (NB-Tower Hamlets study conducted with different methodology so not possible to determine precisely).
- 6.7 The SHMA identifies that even if all the development which has potential to take place within the Legacy Corporation area is delivered this would not be sufficient to meet identified need requirements within the boroughs. Supply within the area is expected to meet a proportion of Borough needs but also that of London as a whole, so the wider strategic need requirements are unlikely to be ever met within this area alone. The importance therefore is placed upon achieving the maximum amount of provision to contribute to these requirements. It correctly identifies that the likely implications of the fact that not all affordable needs can be met through dedicated development then there will be a continued rise in the number of households in receipt of housing benefit in the private rented sector, or a displacement of households to cheaper areas due to the impact of welfare reform. However, it is also noted that the overall size mix within the permitted developments are consistent with needs, therefore the dwellings with planning consents are likely to meet as much need as is possible.
- 6.8 The Affordable Housing Viability Testing, 2013 tested the ability of a range of types of sites to provide varying levels of affordable housing. It used comparison of residual land values to a range of development options and proportions of affordable housing to appraise whether residential development is capable of generating competitive returns and thus whether a scheme is viable. It found that viability varies between individual sites, determined by existing use and existing use value. Where the residual land value is high, higher proportions of affordable housing requirements would make the scheme unviable. For example, the residual land value of office accommodation is sufficiently high to render housing schemes unviable in most cases; however, for existing industrial and community uses, affordable housing is potentially viable at up to 50 per cent.
- 6.9 The study provides evidence that the 35 per cent affordable housing is deliverable in some circumstances and that the level of sales values and existing use values are crucial to determining delivery. This provides a strong base for an affordable housing target based upon 35 per cent affordable housing delivery. It also shows how site-specific circumstances can impact dramatically on viability, so flexibility in the form of in-built viability testing within the policy will ensure that total affordable housing provision is maximised in accordance with Policy 3.12 of the London Plan. This evidence-base minimum benchmark target of 35 per cent affordable housing will be used across the area as the starting point in site-specific negotiations which will consider needs and tenure requirements; targets and delivery rates; need to facilitate development and viability.

- 6.10 The results of the Combined Policies Viability Study, 2014 showed that schemes within the study scenarios can accommodate between 10 and 40 per cent affordable housing, and the flexible approach when combining other policy stipulations, such as sustainability standards and CIL charging with affordable housing requirements some scenarios are identified as viable only at lower levels of affordable housing. In these scenarios, the fixed nature of CIL will mean that affordable housing and sustainability standards are likely to be lowered.
- 6.11 The affordable housing threshold has been set at 10 dwellings and above, which is a continuation of the policy position already set by London Boroughs of Hackney, Newham and Tower Hamlets. A majority of schemes within the Legacy Corporation area fall above this threshold so will be captured by the policy. Affordable housing should be provided on-site. Off-site provision, or financial contributions of equivalent value in lieu of on-site provision will only be acceptable where it can be robustly justified, provided the agreed approach contributes to the creation of mixed and balanced communities. This approach is in accordance with NPPF and London Plan policies.
- 6.12 Figure 3 shows the proportions of each type of housing to be delivered within the Legacy Corporation. For example, where 100 homes are to be delivered, 35 will be affordable, and 21 of these will be affordable rented. Then around 10 will be discounted and 10 capped.

**Figure 3- Housing provision breakdown**



### Affordable rented accommodation and the benefit cap

- 6.13 The Mayor’s Draft Housing Strategy, 2014 sets out how affordable rented homes should be split between those capped at a low affordable rents prioritised for those in the greatest need; and those priced at less than 80 per cent of the market rents for lower income households. The Legacy Corporation shall take the Mayor’s lead, facilitating an equal split between these models.
- 6.14 Rents levels for capped rent should generally be around 50 per cent of market rent<sup>3</sup>. These capped rates shall therefore meet the needs of those most in need and shall be at rates similar to that provided by registered providers at present. Average RSL rents for the boroughs are £111 per week in Hackney, £110 in Newham, £111 in Tower Hamlets and £110

<sup>3</sup> Mayor’s Housing Strategy FAQs, 2013



in Waltham Forest<sup>4</sup>.

- 6.15 Capped rents of up to 50 per cent of market rent would make rents as set out in Table 8 below. The table also shows the benefit cap (at £500 per week) as a proportion of these rents. It shows that as size of property increases the households subject to the benefit cap would have a reduced amount of income once rent has been paid. However, this does show that housing costs for three and four bedroom properties may be over one-third of the household income for larger families. So those in three bedroom or more properties, i.e. typically households of 2 children of different sexes over 10 up to four children of the same sex up to 16 are those most at risk of the benefit cap. The number affected will depend on the individual circumstances, in terms of whether individuals are working or working but not eligible for working tax credits.

**Table 8- 50% market rents compared to benefit cap**

Capped rents	1 bed	2 bed	3 bed	4 bed
50% market rent	£113	£160	£210	£253
Proportion of benefit cap	22.5%	32.0%	42.0%	50.5%

- 6.16 With regard to discounted rents, the London Plan sets out that rents can be deemed affordable at levels up to 80 per cent of market rent. This approach has been adopted by the Legacy Corporation, and can be supported to varying degrees across the boroughs. Other options for this policy, of rents of less than 80 per cent, have been discounted to remain in accordance with the London Plan and other Mayoral strategies but also a lack of evidence to suggest that up to 80 per cent market rent is unachievable within the area.
- 6.17 Imposing rental below the 80 per cent of the market rent has also the potential to compromise the ability to maximise affordable housing provision in London Plan Policy 3.11 and SP.2 and H.2 of the Local Plan, as new affordable provision is likely to be rendered unviable at the 35 per cent level, and this target would also be unachievable. Thus setting a rental cap below 80 per cent would result in the delivery of fewer affordable homes throughout the area. The Combined Policies Viability Study assessed affordable housing on the basis of the 80 per cent rental cap, or local housing allowance where lower and these levels are said to be able to support between 10 and 40 per cent affordable provision across schemes in the area. Therefore the 80 per cent rental cap set at the London level through the London Plan is considered appropriate and achievable at a local level.
- 6.18 Paragraph 3.11 of the SHMA Review confirms that social rented and affordable rent at 80 per cent of market rent can be used interchangeably because the costs of affordable rent can be covered by housing benefit. As stipulated within the Draft Mayor’s Housing Strategy, 2013 and 2014 the remaining affordable ‘discounted’ properties at up to 80 per cent of the market rents are intended to meet the needs of low income working households, those unaffected by the benefit cap (i.e. receipt of benefits below the cap, or no benefits), therefore the impact of the benefit cap is expected to be minimal.
- 6.19 Nonetheless, some additional analysis of the relationship between affordable rents at 80 per cent and the benefit cap is included in Table 11 below. This shows that as the size of the unit increases the 80 per cent market rent housing cost takes up the greater proportion of the benefit cap. However benefit reforms aim to reduce under-occupation of units, encouraging

<sup>4</sup> GLA, 2013 Registered Social Landlords Average Rents <http://data.london.gov.uk/datastore/package/registered-social-landlords-average-rents>

these households to move into smaller properties, freeing up larger properties for those in need of them. Many residents will obviously be in receipt of less than the £500 of benefits, so affordability will be less. This confirms the work carried out by the Growth boroughs<sup>5</sup> which confirmed that those in particular risk of the benefit cap are households of more than three children and out of work, or in work and not eligible for Working Tax Credit. This analysis also stipulates how the mix of family housing impacts on scheme viability, where lesser proportions are more viable.

6.20 As well as modelling the viability of the plan as a whole the Combined Policy Viability Study, 2014 modelled market rents for the area and affordable rents at 80 per cent of market value, as set out within Tables 9 and 11. This rental information has also been updated to borough breakdown by Valuation Office rental rates.

Table 9- 80% Market rents from CPVS and adjusted to 2013 splits

	1 bed	2 bed	3 bed	4 bed
Hackney	£212	£302	£389	£485
Newham	£148	£210	£283	£323
Tower Hamlets	£212	£302	£389	£485
Waltham Forest	£148	£210	£283	£323
Legacy Corporation area Market rate	£225	£320	£420	£505
80% Market Rents	£180	£256	£336	£404

6.21 This rental information has also been used to contrast the median housing costs at 80 per cent of market rate with median incomes within Table 10. This shows the rents within Table 9 against the median incomes as a proportion. As the number of bedrooms increases, affordability decreases, with some borough variance. When considering what is 'affordable', guidance ranges from 30 per cent of net income to 45 per cent of gross income. It shows that Waltham Forest has a better ability to sustain the Affordable Rent model at 80 per cent, whereas affordability will be more difficult for other areas, particularly Hackney where prices are higher.

Table 10- 80% market rent to median income (monthly)

	1 bed	2 bed	3 bed	4 bed
80% market rent	£780	£1,109	£1,456	£1,751
Hackney proportions (gross adjusted)	39.6%	56.4%	72.5%	90.4%
Newham proportions (gross adjusted)	36.9%	52.3%	70.7%	80.7%
Tower Hamlets proportions (gross adjusted)	35.2%	50.1%	64.4%	80.3%
Waltham Forest proportions (gross adjusted)	31.8%	45.1%	60.9%	69.5%
2013 All Boroughs (net)	45.6%	64.8%	85.0%	102.2%
2013 All Boroughs (gross)	35.9%	51.1%	67.0%	80.6%

6.22 However, Table 10 shows the ability to afford 80 per cent market rent without the need for housing allowance or receipt of any benefits. Many of the eligible households will also be in receipt of Local Housing Allowance, which is shown within Table 11. This shows that the LHA is above that of the 80 per cent market cost of one bedroom properties within all areas; however the maximum LHA available in Newham and Waltham Forest for 2 bedroom plus

<sup>5</sup> 2011 – 15 Affordable Homes Programme – An Analysis- The East London Partnership

properties is less than the 80 per cent level. This means that these households would need to supplement this income with that from another source to be able to afford these units at these prices.

- 6.23 Compared to the Local Housing Allowance (LHA) in Table 9, the amount of LHA available for a one-bed exceeds in all cases the 80 per cent of market rents, but (where shown in pink) is below that for larger properties within all areas.

**Table 11- Market rents and allowances**

Beds	Market Rent	80% market Rent	Local Housing Allowance (LHA)				£500 Benefit Cap proportion
			Hackney	Newham	Tower Hamlets	Waltham Forest	
1	225	180	<b>255</b>	<b>180</b>	<b>258</b>	<b>180</b>	36%
2	320	256	<b>299</b>	221	<b>299</b>	221	51%
3	420	336	<b>351</b>	276	<b>351</b>	276	67%
4	505	404	<b>413</b>	319	<b>413</b>	319	81%

- 6.24 As stated above, under the Mayor’s Housing Strategy the needs of those in greatest need will be met through capped rents, so ability of the lowest income levels to meet 80 per cent of the market rents is not as critical.
- 6.25 Although the Affordable Rent product is positioned to replace social rented in most cases, the Legacy Corporation also supports social rented housing delivered within the area. If affordable housing grant may once again become available provision of this tenure expanded, proposals will be supported where it can be demonstrated that it will not compromise the delivery of the quantum of affordable housing in general. Therefore flexibility is built into the policy to enable an appropriate housing mix to be secured under different circumstances throughout the plan period.
- 6.26 Intermediate housing that comprises 40 per cent of the affordable housing provision will largely be comprised of the following products, in line with the Housing Strategy: shared ownership, shared equity, rent-to-save, or other intermediate models. Intermediate housing is primarily forms of low cost home ownership, and does not contain the ‘discounted’ rent product set out above.
- 6.27 In practice paragraph 5.14 of the Local Plan expects developers and registered providers to agree the proposed rental levels be maintained as low as possible, taking account of other considerations such as meeting local needs, welfare benefit caps and the need to maximise housing and affordable housing output. In line with paragraph 3.71 of the London Plan, developers will be expected to engage with a registered provider and secured a commitment to proceed prior to progressing a scheme. The Authority Monitoring Report (AMR) will show progress towards achieving meeting needs and the quantum of accommodation provided, and thus may become a factor in assessing individual requirements.

**Soundness test summary**

- 6.28 The overall approach within Policy H.1 is justified by the evidence contained within the Borough SHMAs, the SHMA Review and the London SHMA, 2013. These studies undertook a comprehensive process analysis to provide an up to date overview of the existing housing requirements within the area. The evidence was prepared in accordance with the Planning Practice Guidance (2014) and the NPPF (2012).

- 6.29 The mix of affordable housing tenures sought at 60 per cent affordable/social rented, and 40 per cent intermediate is in line with Policy 3.11 of the London Plan so is in accordance with overarching policies. It is also based upon proportionate evidence base, setting out local, borough and strategic housing need requirements. As discussed in depth above, the housing delivery within the Legacy Corporation area is to meet strategic, as well as local housing requirements, therefore the London Plan proportion is considered appropriate. It is also appropriate to meet the identified housing needs of the Growth boroughs as well as strategically striking an appropriate balance between demand for these tenures identified within the borough SHMAs and the London SHMA, 2013.
- 6.30 Viability testing has proven the deliverability of the 35 per cent target and the affordable tenure split over the time-period of the Local Plan, so it will be effective in terms of securing affordable housing to meet identified requirements. Setting a challenging target will also help ensure affordable provision is maximised.
- 6.31 The option seeks to maximise affordable housing provision, according to viability. This maintains flexibility across the Plan period, and provides for changing economic circumstances. There is no reasonable alternative to the setting of an overall housing target/affordable housing target as they reflect policy approaches set at that higher level within the London Plan and Draft FALP, 2014. As shown within the SA, the alternative of requiring all affordable housing provision to be on-site has been discounted as this would not provide flexibility in the minority of cases where off-site provision of the required quantum of affordable housing is more appropriate or more achievable in the light of viability or practical matters relating to site circumstances.

## 7. Older person's accommodation

- 7.1 This policy covers specialist needs for accommodation, and is formed from **Policy H.4: Specialist Housing Needs from the LPCD**. No specific comments on the approach to older person's accommodation were received within the Winter 2013/14 consultation.
- 7.2 The over-arching policy requirements in relation to planning for older persons' accommodation are contained within Paragraph 50 of the NPPF which identifies that local planning authorities should plan for wide choice of housing including older people, and the London Plan. Policy 3.5 requires that specific account is taken of the needs of older persons' accommodation in the design of developments, and Policy 3.8 states how when assessing housing requirements specific account should be taken of the needs of older Londoners. The creation of mixed and balanced communities is also the aim of London Plan Policy 3.9.
- 7.3 The Mayor's Housing SPG also provides further guidance. Para 3.1.47 states that developments for older persons' accommodation should deliver a range of products within mixed tenure developments, having regard to appropriate dwelling size and mix. Where the Legacy Corporation consider the proposals for any form of housing accommodation has potential to negatively impact on the aims of London Plan Policy 3.9 by means of the size, scale or tenure of the proposal, local needs requirements should be clearly demonstrated by demand information including waiting lists, potential negative impacts upon the viability of the business venture without this form of development and the Business Case for this approach. The SPG also states that suitable locations of older persons' accommodation are within town centre or edge of centre. Local, District, Neighbourhood and Stratford town

centres are appropriate in the context of the LLDC area. Proposals for the care element of schemes and Use Class C2 accommodation should be located within these areas. Other proposals without a significant element of care should be in accessible locations, within easy reach of the town centres.

- 7.4 The Housing SPG identifies that across London as a whole most of the demand for accommodation comes from within owner occupied households, but provision has generally been within social rented tenures. It includes a useful categorisation of the types of older person’s accommodation, shown in Table 12, showing that generally older person’s accommodation will fall within the C3 use class if it is self-contained, and thus provide affordable housing through Policy H3 below. Non-self contained accommodation such as residential care homes generally falls within the C2 use class. In accordance with London Plan paragraph 3.51 both C2 and C3 accommodation will be assessed on a case-by-case basis as to whether affordable units need to be provided. The delivery of C2 units should not inhibit the ability to deliver C3 units, and should the LLDC deem this to be the case, permission will be refused.

Table 12- Forms of older person's accommodation

Accommodation	Includes:
Specialist older person’s housing (Use Class C3)	<ul style="list-style-type: none"> <li>• Downsizer accommodation</li> <li>• Senior co-housing</li> </ul>
Specialist housing (Use class C3)	<ul style="list-style-type: none"> <li>• Sheltered accommodation/ retirement housing</li> <li>• Extra care accommodation (also called close care, assisted living, very sheltered or continuing care housing)</li> </ul>
Use Class C2 – Residential institutions	<ul style="list-style-type: none"> <li>• Residential / nursing care</li> </ul>

- 7.5 Alike the rest of the country the population of the Legacy Corporation is likely to grow older over the plan period. The London Plan explains that need for older person’s accommodation is not evenly distributed across London. The population projections show that the LLDC area is likely to be younger than other, often outer parts of London, but as identified within the SHMA the ageing population will still have an impact. Therefore, policies seeking a specific number of units, or site allocations are not deemed necessary, instead the policy approach is to resist the loss of accommodation for older persons and support the provision of older person’s accommodation which addresses identified needs.
- 7.6 The policy, alongside SP.2, sets out how the Legacy Corporation will resist the loss of older person’s accommodation in general, applying the same approach to all forms and use classes. It specifies that the loss will only be acceptable when the use is unsuitable or does not meet specified standards. Specified Standards for care homes are set out National Minimum Standards for Care Homes for Older People, 2003 and apply to care homes providing accommodation and nursing or personal care for older people. For sheltered and extra care housing the relevant standards are Design Principles for Extra Care housing, 2008, and should enable staff to run the development effectively, ensure flexibility of tenure and care. Therefore any form of housing for older persons which is registered and/or generally conform to the key design principles will be protected by policy. If the accommodation does not conform to these Standards the applicants will be expected to demonstrate that it is incapable of meeting these standards, or the costs of making it suitable are unviable. Additionally, where a loss is proposed should be able to demonstrate that there is no need

for this form of accommodation. The policy therefore requires that these good practice principles have been incorporated into the design of the development, considering the impairments of the end users and their likely requirements; staff needs and those of visitors.

- 7.7 Building to lifetime homes standards and providing 10per cent of units as wheelchair accessible under Policy 3.8 of the London Plan (as referenced within Policy H.3) will enable older people within the LLDC area to remain in their homes for longer; however it is still important to meet the needs of older persons by providing a range of different accommodation types, with varying levels of support services where it is suitable and meets relevant standards.
- 7.8 As stated above Policy 3.8 of the London Plan requires that the changing age structure of London’s population structure and, in particular the requirements of older persons’ are fully accounted for. One of the pivotal roles of the Legacy Corporation is to meet the strategic, London-wide housing requirements, and this should also be reflected in specialist housing requirements. The strategic need for older persons’ accommodation should therefore be demonstrable alongside local requirements.
- 7.9 Although the Legacy Corporation hasn't been given a benchmark figure for older persons' housing through the FALP Policy 3.8 Housing Choice it recognises the role of provision of variety of forms of such accommodation. The London SHMA, 2013 assessed trends across London, identifying a net requirement of between 3,600 and 4,200 new older person's housing units per year between 2015 and 2025. Indicative splits of 66 per cent private sale, 26 per cent shared ownership and 8 per cent affordable rented. There may also be a requirement for some 400 - 500 new bedspaces per annum in care homes. The Legacy Corporation's SHMA Review, 2013 did not specifically assess the strategic or local needs of older persons but the SHMAs for the four growth boroughs have some existing evidence. Despite being defined in various different ways within the studies, the key messages for older persons, are that the population of older persons is set to increase so a range of specialist accommodation needs to be provided. More specifically, within Newham, older person households are more likely than the general population to be owner occupiers, however within Hackney and Tower Hamlets they are more likely to be living in social rented or RSL accommodation. This shows that there is a requirement for both these tenures.
- 7.10 The Role of the Planning System in Delivering Housing Choices for Older Londoners, December 2012 looked at the strategic, London-wide requirements of older persons and how the planning system should respond to the challenge of the ageing population. It shows how provision of retirement housing in London as a whole averaged just below 1,200 units a year in the two years to November 2012. Against this provision, London may require between 2,000 and 2,350 new older people’s housing units, falling within C3 use class each year between 2011 and 2021. Table 13 below breaks this down further; provision within the legacy area should generally reflects these strategic proportions, but not inhibit the role of H.2: Affordable Housing. London may also require 500 new bedspaces per annum in care homes falling within the C2 use class but with differing borough requirements.

Table 13- Older persons’ accommodation tenure in London

Tenure	Number	Percentage
Owner occupied	1,500	64%
Shared ownership	500	21%
Affordable	350	15%

<b>Total</b>	2,350	100%
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- 7.11 The Study identifies that the cost of developing older persons' accommodation is greater than residential, but also identifies how the cost to service users differ for different forms of accommodation. Extra Care housing is more expensive than sheltered accommodation, so it is presumed that as the greater amount of care is provided the accommodation becomes less affordable. Therefore, as the affordability decreases the depth of justification of needs and how the accommodation will meet the population profile will increase. This is to ensure that the right forms of accommodation are provided to meet requirements. The Study concludes that specialist development viability appraisals should be conducted for older persons' accommodation. These studies will ensure the detail provided above can be built into the development's viability.
- 7.12 With regard to local need, population projections contained within the 'Our Area' Spatial Portrait Background Paper show that the population age of the LLDC area is likely to rise over the plan period. In general terms the demand for older persons' accommodation is likely to mimic that of the boroughs in areas of existing population; however in newly-created communities profiles are likely to be more mixed. Under-occupation may be less of an issue in the short term as households move into dwellings that suit their current requirements. The lifetime homes and wheelchair accessibility standards are also likely to mean that older households stay within their new homes within the LLDC area for longer. Therefore it is anticipated that there will be local need for older persons' accommodation within the area, but this is likely to be at a lower level than the four boroughs due to a high proportion of units being built to lifetime homes and accessibility standards, and the age profile being younger.

#### *Soundness test summary*

- 7.13 The overall approach within Policy H.3 is justified by the evidence contained within the Borough SHMAs and the London SHMA, 2013. It is in accordance with requirements within the Mayor's Housing SPG, also building on evidence collected at the strategic level for London.
- 7.14 The policy seeks to enable proposals for older persons accommodation be located in the most sustainable manner, ensuring that the accommodation functions for its users. As identified within the Sustainability Appraisal, no specific alternatives have been considered as the main alternative would have been to not address or promote meeting these types of housing needs within the plan which would not adequately reflect the guidance set out at a national and regional level.

## **8. Student accommodation**

- 8.1 This policy covers specialist needs for accommodation, and is formed from Policy H.4: Specialist Housing Needs from the LPCD. Winter 2013/14 consultation responses in relation to this policy were generally supportive of the inclusion but specific comments related to some inconsistencies with London Plan policies, and the policy should be expanded to include locational preferences, concentration and amenity concerns and how impacts should be managed.
- 8.2 Paragraphs 50 and 159 of the NPPF require that Local Planning Authorities plan for a wide



choice of housing, creating sustainable, inclusive and mixed communities. The London SHMA 2013 specifically looked at the accommodation needs of students, under a number of growth scenarios the student population is expected to grow significantly by 2026. Translated into demand for spaces estimates that the most likely scenario is a demand for between 2,500 and 3,100 student bed spaces a year. The Draft FALP acknowledges the role some inner boroughs have played in past provision, advocating a more dispersed approach in the future, taking into account capacity, aiming to secure accommodation which is more affordable to students as a whole. Working with academic bodies is crucial to the determination of requirements.

- 8.3 The London Plan Policy 3.8 ensures demonstrable strategic and local needs for student accommodation are addressed. This implies that needs must be specifically identifiable and evidence based, and can be met on a local or strategic scale. Para 3.53 of the London Plan specifically identifies, however that these demands should not compromise the ability to meet the need for conventional dwellings, particularly affordable housing. Also sets out how accommodation should be secured to specific educational establishments. This approach is being taken forward by the Legacy Corporation.
- 8.4 Policy 3.9 also promotes the creation of balanced and mixed communities, particularly by tenure and household income. Preventing segmentation by tenure, building more than one tenure within developments and encouraging infill development of new tenures in mono-tenure estates. The Legacy Corporation considers that this is key within the area where there have been a number of large proposals within the LLDC area, and in the vicinity at Stratford. It considers that the clustering of this form of accommodation in and around the Stratford area has the potential to create an imbalance, so should be looked at carefully before any new permission for this form of accommodation is granted. The direction of the LLDC Policy H.4 stems from the London Plan Policy 3.8; however localised pressure for such accommodation has driven the details of the approach.
- 8.5 The 2010 East London SHMA (ELSHMA) assessed the needs of students within the wider sub-region, providing some useful contextual information. Many of the students lived with family members so it is assumed that many of those living within student accommodation come from outside the area. It also shows how 31 per cent of students within the sub-region reside in Newham, 28 per cent in Tower Hamlets, 26 per cent in Hackney and just 4 per cent of the students live in Waltham Forest. This could be interpreted that there is great demand for student accommodation in Newham; however market forces play a part. The existence of good value private rented accommodation will act as a draw to students. Interviews with a Higher Education Institution (HEI) within the London SHMA suggests that purpose built accommodation is outside the price range of domestic students. Therefore the affordability of new units is key to the suitability to meeting local need.
- 8.6 Existing local policies in relation to student accommodation are contained within the planning policies of the four boroughs. Tower Hamlets Core Strategy policy SP02 sets out a locational approach to provision of student accommodation being appropriate around existing institutions. Hackney Core Strategy sets out that the provision of purpose built student housing will have regard to evidence of need, London Plan targets and local characteristics, ensuring delivery is not prejudicial to delivery of 'normal' housing. The Publication version of the Development Management DPD will not apply to the LLDC area but the general stance is to prevent student accommodation having a negative impact on housing or employment site delivery or lead to an over-concentration of student accommodation which could be detrimental to residential amenity, character and function.



Accommodation should also serve existing educational establishments and be within 30 minutes travelling time. Guidance for Waltham Forest Core Strategy on the issue of student accommodation is contained within the Development Management Policies which does not apply to the LLDC area.

- 8.7 In relation to Stratford where most of the pressure for student accommodation is located, the Newham Core Strategy Policy H3, Specialist Housing Needs encourages student housing where there is no potential for nuisance to existing communities. The non-statutory Stratford Metropolitan Masterplan also sets out that new student bedspaces can be appropriate within Stratford and how student accommodation could subsidise other less viable uses. Newham applies a flexible approach to the provision of uses to help the implementation of the development framework objectives whereby more viable uses can supplement (such as food store or student housing).
- 8.8 As stipulated in the London Plan, mixed and balanced communities should be created, with mono-tenure enclaves avoided. The growth of purpose built accommodation within the private rented sector creates a specific product within the market; it is important that this product does not dominate the supply of housing or create a significant shift in tenure split. The Newham SHMA, 2010 identifies that at 19.9 per cent Stratford has a higher than Newham average proportion of those living within the private rented sector. Private rented stock has significantly increased within the Stratford area since 2001. Additionally, as identified within the study, students have lower than borough average incomes. Additional student accommodation has potential to create imbalances in tenure and income in the community, both scenarios identified within the London Plan Policy 3.9.
- 8.9 Related to this, additional student numbers has potential to bring about some negative impacts in terms of noise and disturbance. Over-concentration of student accommodation can be detrimental to residential amenity in terms of noise and disturbance, the residential character of an area by creation of a transient community and the function of the area in terms of facilities catering solely for students, forcing out more local services and facilities.
- 8.10 In terms of delivery, the Legacy Corporation is expected to provide 12.5 years worth of student housing within the first 5 years of the Plan. The annual housing target of is made up of 171 non-self contained units, including student accommodation, which amounts to just under 12 per cent of the annual supply. Within years 1 to 5, it is expected that around 29 per cent of all housing delivery will be for non-self contained student accommodation of 2,141 units and demonstrates that the LLDC area has, and thus can be considered to be over-providing. The impact of this over-provision is likely to fall within two scenarios: creating demand for additional purpose built accommodation within the locality or the increase in supply drive down prices and potentially accommodates students currently living within the private rented sector. However, as prices are high and are more often to taken up by non-domestic students the former is more likely to be the case.
- 8.11 The Legacy Corporation is concerned about the impacts of the former scenario in terms of driving additional demand for purpose built student accommodation. Due to differences in pricing, and the fact the purpose built accommodation is geared towards first year students, the provision of purpose built student accommodation is unlikely to result in students moving from the private rented sector, instead bringing additional student numbers to the area, in addition to those already within private rented. If these additional students then stay within the same area in their second and third years this has the potential to drive up the rate of private rented accommodation.

- 8.12 In the context of the above, in locations where mixed and balanced communities could be compromised, particularly in the Stratford area, the Legacy Corporation will expect all proposals for student accommodation to justify that there is a genuine local need for this product and that it provides an affordable alternative to the private rented sector. In the context of normal housing delivery, need is defined as those *“who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market”* (SHMA Guidance, 2007). In the context of SHMAs students are often classed as only able to afford social rented accommodation, as is the case within the Newham SHMA which identifies that 50 per cent as such. Therefore those local students already residing within the area can typically only afford housing at affordable housing rates. In reality the private sector plays a substantial role in meeting this need. Local need will be determined by HEI waiting and demand lists, business cases, how not doing proposal has potential economic repercussions of not carrying out the proposed development.
- 8.13 The University of East London at Stratford is the nearest higher education institution to the LLDC area, at around a mile from the eastern edge, followed by Queen Mary’s at Mile End at a distance of around 2 miles. However the East London SHMA shows how generally students in London do not live close to their HEI and as distances travelled can be up to an hour this shows that price is also likely to be a factor, providing public transport is reasonably accessible. Purpose-built accommodation is often dominated by first year or first year postgraduate students. As most of these students come from typically long distances they are most likely to be moving into the area. Therefore proposals for new student accommodation also should be able to demonstrate that they are located suitably for easy access to local HEIs or public transport.
- 8.14 In other locations where student accommodation could enhance mixed and balanced communities, then proposals would be expected to show that the proposal meets a genuine strategic need for student accommodation at an appropriate affordability.
- 8.15 This policy also aims to prevent student accommodation inhibiting the ability to meet other housing needs within the market and affordable sectors. Links with educational establishments prevent long term vacancies and redevelopment to C3 units without affordable provision. Affordable housing will not generally be expected to be provided as long as links with an HEI have been established. Should links break down over the lifetime of the development then affordable housing monies will be expected to be provided. Links with educational establishments should be sought to support proposals, otherwise affordable housing will be expected to be provided on site.

#### *Soundness test summary*

- 8.16 The overall approach within Policy H.3 is justified by the evidence contained within the Borough SHMAs and the London SHMA, 2013. These were prepared in accordance with the SHMA Guidance, 2007, and are compliant with national and London Plan policies.
- 8.17 The policy seeks to enable proposals for student accommodation be located in the most sustainable manner, ensuring that the accommodation is most suitable and affordable for its users and the wider community. In order to achieve this aim, only options which are in accordance with the London Plan policy 3.8 are considered. The main alternative to this policy would have been to not address or promote meeting these types of housing needs within the Plan. However, the detail of the supporting text enables Stratford to be identified as

having potential for mixed and balanced community issues through highlighting to potential developers the level of historical provision within Stratford, and the problems which could arise without careful planning. The inclusion of mixed and balanced community considerations in this case are considered appropriate to help consider the appropriateness of each development on a site-by-site basis.

## 9. Planning for Gypsies and travellers

- 9.1 This policy covers specialist needs for accommodation, and is formed from **Policy H.4: Specialist Housing Needs from the LPCD**. Winter 2013/14 consultation responses in relation to these policies stated that a five-year pitch target should be included, and sites should be allocated for further accommodation.
- 9.2 The policy requirements of Planning Policy for Traveller Sites, 2012 are similar to that of housing in general. Notably that local planning authorities should make their own assessment of need, and work collaboratively to provide for this identified need. This involves identifying and updating annually a supply of specific, deliverable sites to meet five years' worth of site provision; and developable sites or broad locations for meeting requirements for years 6 to 10 and 11 to 15. Other considerations in doing so include site-specific circumstances and local amenity and environmental matters. Criteria should also be set to guide allocations where there is an identified need. The Draft FALP, 2014 requires local planning authorities to take account of, and meet needs for gypsies and travellers.
- 9.3 In order to meet the national policy requirements the Legacy Corporation commissioned consultants to conduct a Gypsy and Traveller Accommodation Assessment, 2014. This assessment followed standard methodology to determine requirements for new pitch provision within the Plan period. This study identified a requirement for between 10 and 19 new pitches over the plan period, with a total requirement for 41 pitches in the unlikely event that the existing gypsy and traveller site at Parkway Crescent in Newham needs relocating to within the LLDC area. The study also identified a requirement within the first five years of the Plan Period of between six and 13 pitches. The study identified that a majority of the need arising within the area is from within Hackney.
- 9.4 The Gypsy and Traveller Site Assessment, 2014 assessed six sites for their potential use for gypsy and traveller accommodation. It concluded that two sites had some potential, subject to further investigation.

### Setting a pitch target

- 9.5 Policy H.5 itself sets out the circumstances of how new sites or proposals will be assessed, and the pitch target has been set out within paragraph 5.25 of the Local Plan. A site allocation (SA1.9) has been made to provide a supply of deliverable sites to meet the requirements. This approach is consistent with the requirements of Planning Policy for Traveller Sites, 2012, and therefore is the only reasonable alternative.
- 9.6 However, it is understood that there are a variety of approaches which can be taken to setting a pitch target and how it is demonstrated, including availability of deliverable and developable land, requirements for land resources, need and other constraints. Set out within Table 11 below are options based upon needs alone spread over the whole of the plan period; needs frontloaded to the first five years of the Plan period; and capacity based.

As shown above, the lower end of each of these figures is to meet need only arising within the Legacy Corporation area; the higher meets a proportion (20 per cent) of need arising within Hackney. It shows that the selected option is the only option to fully meet national policy requirements.

Table 14- Pitch target options

Option	Whole Plan period	First 5 years	Years 6-10	Years 10-15
1- Needs based	10 to 19	4 to 7	3 to 6	3 to 6
2- Needs based- frontloaded	10 to 19	6 to 13	2 to 3	2 to 3
3- Capacity based	9	9	0	0

- 9.7 The second option based on needs alone but frontloading the needs for the first five years has been chosen because it is the most appropriate in terms of the NPPF policy requirements relating to need, best reflects the actual requirements within the area and the requirement to meet backlog needs within the first five years, rather than spread over the plan period is factored in. Determining a pitch target based on land availability alone would not meet the identified needs requirements, and thus NPPF paragraph 47 requirements. Therefore the selected option of setting a pitch target on needs alone, frontloaded to the first five years of the plan period is the most appropriate for the needs of the gypsy and traveller community.

### Site search and assessment

- 9.8 The Legacy Corporation has undergone three site selection processes to determine the availability of suitable sites within its area: discounting sites with policy constraints, planning permissions, allocations or substantial capacity for mixed or housing development; the Gypsy and Traveller Site Assessment Study, 2014; and finally some further investigation. Unlike the SHLAA, the site size was not limited to those of over 0.25ha, and sites of over 0.1ha were considered for gypsy and traveller use.
- 9.9 Within the first stage, sites were removed from consideration under three circumstances:
- a) Subject to comprehensive planning permission-14 large sites were discounted as subject to planning permissions to be implemented, preventing other forms of development taking place
  - b) Allocated, or proposed for allocation for other uses within the Local Plan- Six sites without planning permission have been allocated through the Local Plan for a mixed of uses. These have not been considered for gypsy and traveller site uses as they have been assigned housing capacity through the SHLAA, and have been submitted for the mix of uses through the Call for Sites processes. Removal of these sites from overall housing capacity would inhibit the ability to meet overall housing numbers.
  - c) Sites with Metropolitan Open Land, Local Open Space or employment designations- A number of sites were excluded because policy constraints would prevent development for gypsy and traveller use.
- 9.10 Once these discounts have been made there are a number of locations which could potentially yield capacity as shown within Figure 4. At this stage consideration was made of sites identified within the SHLAA which are not proposed for allocation.

Figure 4-Broad locations of search

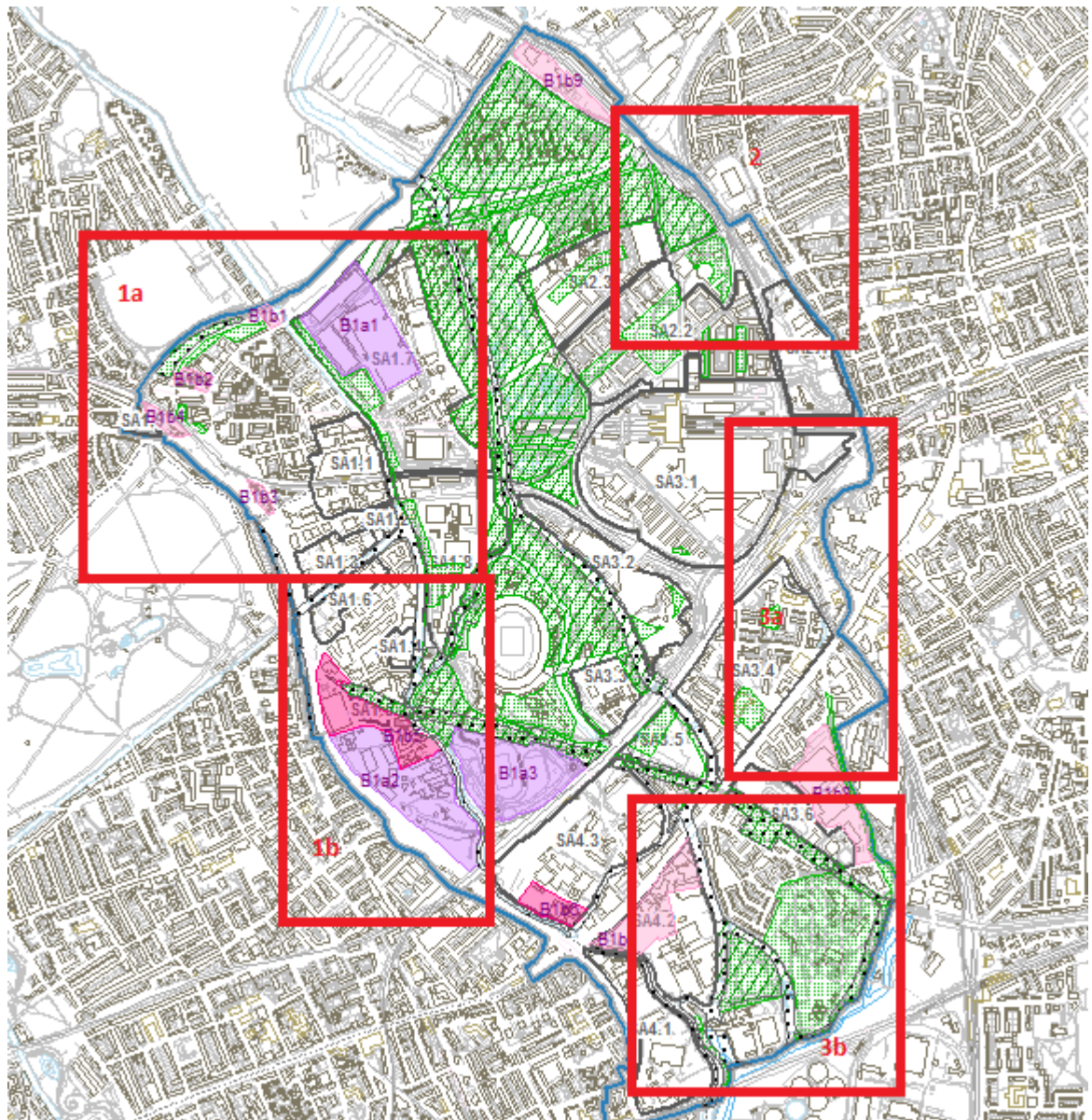


Table 15- Broad locations of search

Broad location	Commentary	Outcome
Sub Area 1a- Hackney Wick	Close proximity to the existing site at Chapman Road and area where need arises make this area prime for consideration. This area contains some larger sites some of which are identified within the SHLAA.	Investigate locations
Sub Area 1b- Fish Island	Close proximity to the existing site at Chapman Road and area where need arises make this area prime for consideration. This area contains some larger sites some of which are identified within the SHLAA.	Investigate locations
Sub Area 2- Leyton Road North	Large site was subject to employment designation at time of site selection. Although it is now proposed for release following the conclusions of the ELR, it is still in employment use so not currently available. Redevelopment proposals would also be	Discount

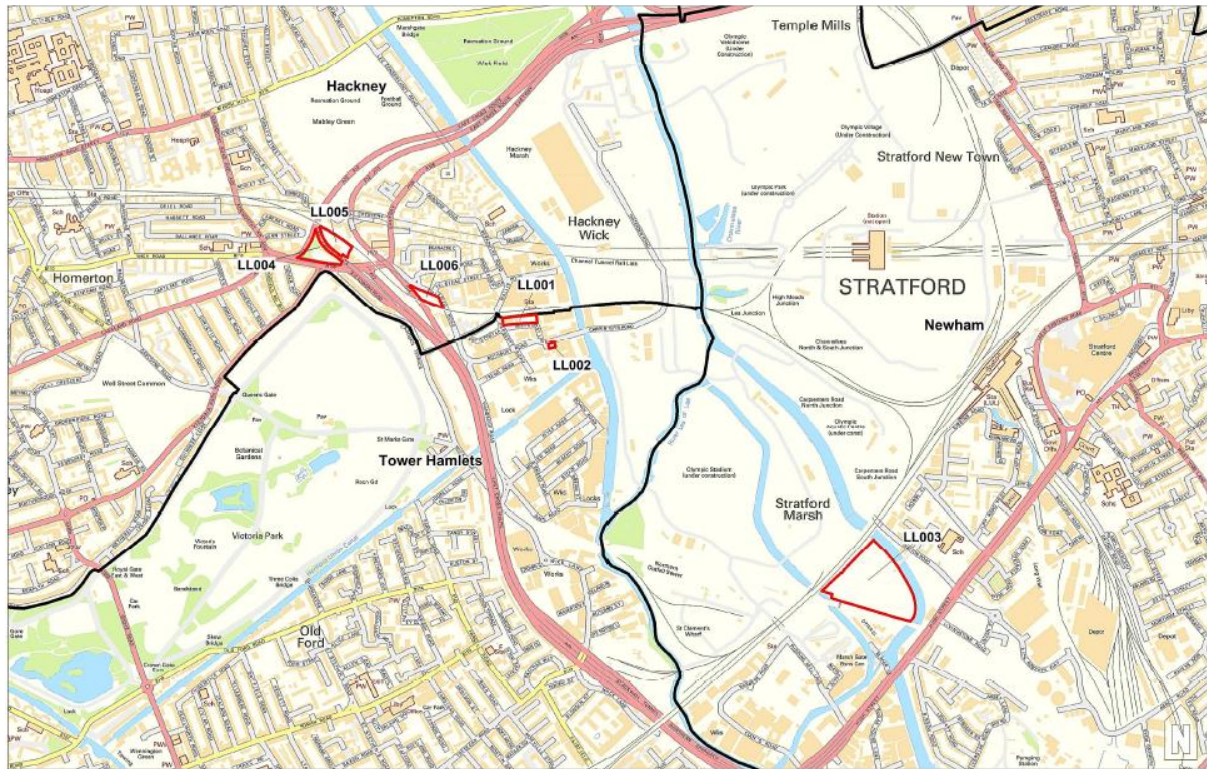
	required by policy to re-provide equivalent employment floorspace. No suitable parts in public ownership	
Sub Area 3a- Area around Stratford Station and Stratford Workshops	This area contains some larger sites some of which are identified within the SHLAA. Planning permissions for the surrounding area limit the potential of sites around this area. Parts of the location are either in existing employment use, dense housing and/or multiple ownerships. No suitable parts in public ownership.	Discount
Sub Area 3b- High Street	No large sites within the area. Parts of the location are either in existing employment use, dense housing and/or multiple ownerships. No suitable parts in public ownership.	Discount
Sub Area 4- North of Mill Meads	No large sites within the area. Area also contains dense housing in multiple ownerships. No suitable parts in public ownership	Discount

9.11 This first round identified two broad locations which were not subject to allocations, employment or open space designations at Hackney Wick and Fish Island. Many of the other locations have been identified for large scale redevelopment and housing capacity identified within the SHLAA, or were under multiple ownership so were discounted. This did not leave any potential sites within single ownership or not part of wider housing estate with no intensification plans.

9.12 A number of locations within the 'prime' search area of Hackney Wick/Fish Island were revisited on the basis of their public or Legacy Corporation ownership and/or those submitted through LLDC and Hackney Call for Sites processes for gypsy and traveller use. The Bridgewater Road site, in LLDC ownership was also re-inserted at this point because it was specifically identified within the Call for Sites. These six sites were then considered fully within the Gypsy and Traveller Site Assessment Study, 2014 as shown within Figure 5. Table 16 below shows the conclusions of this main assessment, demonstrating further how the filtering process reduced the number of potential sites to two. Conclusions of this study were that none of the assessed sites met all the criteria at the point in time, but two sites (Chapman Road Depot, Bartrip Street South) had some potential subject to open space and site availability considerations being overcome.



Figure 5- 2014 Gypsy and Traveller Site Assessment Site Map



Sites Assessed

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Table 16- Site Assessment Study, 2014

Reference	Site	Why included	Study conclusions	Consider further?
LL001	31-41 White Post Lane	Owned by LLDC	Discount- Flood Zone 3	No
LL002	90 White Post Lane	Call for Sites	Discount- Flood Zone 3	No
LL003	Bridgewater Road	Call for Sites Owned by LLDC	Owned by LLDC Discount- Has outline planning permission for other uses which will be implemented. Permission for 300 homes and 1.1 ha of allotments.	No
LL004	Bartrip Street South	Call for Sites Publically owned	Consider further subject to availability and open space considerations.	Yes
LL005	Bartrip Street North	Call for Sites Publically owned	Discount- Designated employment site	No
LL006	Chapman Road Depot	Call for Sites Publically owned	Consider further subject to availability and review of employment designations resulting from ELR.	Yes

9.13 The two sites identified within the Gypsy and Traveller Site Assessment Study, 2014 have been further investigated and assessed against site constraints and deliverability criteria. These two sites and study conclusions, alongside further analysis are shown within Table 17 below:

Table 17- Further site considerations

Site	2014 Study Conclusions	Results of further investigation
Chapman Road Depot	The site is publically owned by London Borough of Hackney and therefore potentially available for Gypsy and Traveller use. The site is subject to current leases on the land which is currently being used for storage. However, the site is currently protected by Hackney Core Strategy Policy 16 'Employment Opportunities 'Other Industrial Area' for employment use. It is also allocated in the LLDC Draft Local Plan, under Policy BEE3 'Locally Significant Industrial Site'. The site is otherwise potentially suitable for Gypsy and Traveller use, but as the site is allocated for employment use in current and draft policy and leased for employment purposes. Therefore the site would need LLDC to Reconsider employment use in the Local Plan before submission and adoption and determine if the current lease would prevent the site coming forward in the plan period.	<ul style="list-style-type: none"> <li>• Publically owned- not available</li> <li>• Required for LB Hackney operational reasons</li> <li>• Released from Other Industrial Land designation, but still in employment use which is protected by adopted LB Hackney planning policies and will be protected in the future by Policy B.1</li> </ul> <p><b>DISCOUNT ON AVAILABILITY GROUNDS</b></p>
Bartrip Street South	The site is identified within Hackney Core Strategy Policy 26 Open Space Network which protects open space. The LLDC Local Plan Consultation Document proposes that Local Open Space will be protected, and loss will only accepted where re-allocated elsewhere. The site is open space and there is currently no proposal to re-allocate elsewhere. The site is public land and appears in poor quality with no public access and therefore could be deemed unsuitable for continued use as open space, subject to an Open Space audit undertaken by LLDC. However the site is owned by TfL who have confirmed that the site is not available for Gypsy and Traveller use and therefore any re-consideration of the sites use would need the site to become available. LLDC should keep the sites availability under review.	<ul style="list-style-type: none"> <li>• Consultation with the landowner has confirmed availability, and there is a realistic potential of the site being deliverable within the first five years of the Plan period.</li> <li>• Review of Local Open Space assessment places limited value and function of the land so can be released for other uses</li> </ul> <p><b>SUITABLE FOR ALLOCATION</b></p>

9.14 The results show that the Bartrip Street South site is suitable for allocation, and the Chapman Road Depot site has been discounted on policy and availability grounds. Using standard site plot formats identified within the Gypsy and Traveller Site Assessment Study, 2014 against the site size it is anticipated that the Bartrip Street South site will be able to deliver a maximum of 9 new pitches. This does not take account of landscaping and need to maintain some of the site's green features. For further details on site selection see Sites Report, 2014.

9.15 There are no other alternatives which would be appropriate. The only other alternatives



would involve looking again at the approach to open space and employment designations as well as re-assessing site allocations.

- 9.16 The Review of Local Open Space, 2014 assessed local open space locations which met the criteria of London Plan Table 7.2 (Benchmark Public Space hierarchy). Bartrip Street South does not meet these benchmarks. Many of the open spaces are also designated MOL and therefore release of these would be contrary to the aims of the NPPF in terms of Green Belt (which MOL has same status). See Natural Environment Background Paper for more information on the Review.
- 9.17 The Employment Land Review, 2014 identified a small surplus of industrial land for which two sites have been released from designation. These sites are within Hackney Wick and Leyton Road North. Release of further sites of employment may be appropriate subject to close monitoring and delivery of other forms of employment through mixed use development. Further release of employment sites which would not meet these aims is not therefore deemed appropriate, including at Leyton Road North where employment floorspace should be maintained, making the site unsuitable and unviable for gypsy and traveller use. Release of employment for gypsy and traveller use would also be contrary to the overall aims of the Legacy Corporation to maintain and increase employment capacity.
- 9.18 Reassessing site allocations would remove housing capacity which plays a key role in delivering the strategic housing requirements, or infrastructure requirements. This would have a potential risk of not being able to deliver the annual housing target. This would not only be inappropriate in terms of the Legacy Corporation's aims, but it would also not be achievable as land values for these areas are determined by their ability to deliver housing, so other uses with lower returns, i.e. gypsy and traveller accommodation, would not be viable.
- 9.19 This site filtering process therefore demonstrates that there are no other suitable, available and achievable sites for gypsy and traveller use within the Legacy Corporation area within the Plan period, and the strategy is the most suitable alternative.

### Ability to meet pitch requirements

- 9.20 Table 12 below shows the estimated delivery against the potential targets. It shows that the only option where the Legacy Corporation would be able to meet the requirement over the whole of the plan period is Option 3. This option is primarily based upon the outputs of the Site Assessment Study set out below; and is not linked to need requirements, therefore is not appropriate to meet the NPPF requirements. Option 1 would enable the Legacy Corporation to meet the first 5 year requirement, but with no other sites deliverable or developable, it would not be able to meet needs over the plan period. Under the selected Option 2 only the lower end of the needs for the first five years can be met, which means all of the proportion of needs would not be met.
- 9.21 The identified site at Bartrip Street South is deliverable within the first five years of the Plan period, which has been confirmed by the landowner. However, as shown below estimated delivery within the site would only meet the lower end of the first five year pitch target, and it is not anticipated that the needs over the whole of the plan period can be met. The Legacy Corporation will work with its constituent and neighbouring authorities including Hackney to identify and deliver additional sites to meet wider sub-regional requirements.

9.22

Table 18- Estimated delivery

Option	First 5 years	Estimated delivery (% 5 year target)	Per annum
1- Needs based	4 to 7	9 (300-150%)	0.6-1.2
<b>2- Needs based- frontloaded</b>	<b>6 to 13</b>	<b>9 (150-69%)</b>	<b>1.2-2.6</b>
3- Capacity based	9	9 (100%)	0.6

- 9.23 At the outset of the studies the four boroughs to explore the potential for joint working on the matter but at the time no borough was in a position to do so because they had recently adopted planning policy or a different timeline for production of planning policy documents. The Legacy Corporation will need to work with these boroughs further once they have reached a relevant point of review, to ensure that the options and solutions for meeting the projected need is met in a way that is appropriate to the borough in question.
- 9.24 The overall approach also takes into account the statutory housing responsibilities that continue to sit with each of the four boroughs rather than with the Legacy Development Corporation which in this instance has only the statutory powers and responsibilities of the Local Planning Authority. This will involve identifying where there is a surplus requirement and sharing skills and resources, where appropriate, to deliver additional pitches across the sub-region. Also see Duty to Co-operate Background Paper.

#### *Soundness test summary*

- 9.25 This policy approach is based upon sound evidence contained within the Gypsy and Traveller Accommodation Needs Assessment, 2014 and the Gypsy and Traveller Site Assessment, 2014. These studies undertook a comprehensive process of survey and analysis to provide an up to date overview of the existing requirement and current supply of pitches within the area, including three scenarios which go further to identify where requirements could arise from outside the area boundary; and suitability of sites for such identified requirement. The evidence was prepared in accordance with Planning Policy for Traveller Sites (2012) and Planning Practice Guidance (2014).
- 9.26 In relation to the delivery of the site at Bartrip Street South, cooperative working will continue to take place with the London Borough of Hackney and Transport for London in order to investigate options available for delivery of the travellers' site in this location. These discussions will be progressed as the Local Plan progresses through to Examination and adoption.
- 9.27 This policy is seeking to set out the Legacy Corporation's approach to meeting requirements for gypsy and traveller accommodation needs, as well as considerations for determining the location of future gypsy and traveller sites. The allocation of a site has been made to meet some of the requirements for sites; however it is not possible to meet all these needs within the area. The Policy itself arises from paragraph 10 requirement of PPTS, 2012, and therefore alternatives are confined to the Policy itself rather than national policy requirements. Therefore, only options which meet the requirements of Planning Policy for Traveller Sites, 2012 in particular in terms of setting pitch targets and criteria for considering sites, or new proposals have been considered. As specified within the SA, no other specific alternatives have been considered as the main alternative would have been to not address or promote meeting these types of housing needs within the Plan which would be contrary to national policy.

## 10. Other Policies

### Houses in Multiple Occupation

- 10.1 **Policy H.6 (HMOs)** has been developed from Policy H.5 of the Local Plan Consultation Document, 2013. Winter 2013/14 consultation responses gave support for the policy, including specifically for commitment to investigate Article 4 Direction.
- 10.2 London Plan Policy 3.8 Housing Choice also deals with how HMOs are an important part of the housing stock, however the issue in many surrounding areas is that of quality and appropriateness of this stock, particularly where it becomes prevalent within established streets and locations with a consequent effect on the mix and balance of the community. Para 3.55 of the FALP acknowledges the important strategic role of HMOs in meeting housing needs. The Legacy Corporation's SHMA review also adds contextual background, whereby the HMO will provide an increasing role in meeting the housing needs of those in receipt of benefits. This is recognised by the Legacy Corporation so existing accommodation of good standards and affordable should be maintained.
- 10.3 HMOs of a reasonable standard will be protected by the policy. The LLDC policy approach is generally positive in the view of HMOs and is in line within the approach of the London Plan. London Borough of Newham however, has a different approach and are keen for the LLDC to proceed with an Article 4 Direction in parts of Stratford to prevent changes of use under permitted development rights from C3 to C4 (HMOs). Given the small size of the area concerned, and a lack of fine-detailed evidence supporting this, it is not envisaged that this will take place in the short to medium term. However, the Legacy Corporation will monitor the impact of these changes of use on the housing market area.
- 10.4 New, purpose built HMOs within the C4 use class will be supported provided an element of affordable accommodation is provided, of good standards and would not compromise aims of mixed and balanced communities. Proposals for new student accommodation will be dealt with via Policy H.4 of the Local Plan.

### *Soundness test summary*

- 10.5 The need for HMO accommodation arising from changes in the welfare system is identified within the SHMA Review, 2013. The potential for a need for Article 4 would be subject to the receipt of further evidence suggesting a need. The approach is in accordance with overarching policy in terms of providing for a wide housing choice. No alternative has been considered as the need for HMO accommodation is flagged through the outcome of relevant housing needs assessment and review work.

### Large Scale investment in private rented sector

- 10.6 **Policy H.7: the Large-scale Investment in the Private Rented Sector** has been developed from Policy H.6 of the Local Plan Consultation Document, 2013. Winter 2013/14 consultation responses in relation to this policy commented that large-scale investment in the private rented sector could compromise mixed and balanced communities, but others were in support where appropriate.
- 10.7 Growth of the private rented sector is being captured to assist in meeting specific housing needs. In this aim, the FALP (Policy 3.8) specifies that the planning system should play a

more proactive role in the provision of the private rented sector. Covenanted PRS, meaning that secured for the long term within this sector, should be supported by specific viability assessment to overcome the viability difficulties of delivery of this form of accommodation. The benefits of this approach being able to support people to remain in the area with flexible secured tenancies and a managed approach to provision.

- 10.8 Additionally, this policy seeks to support investment in the private sector as a means of meeting some of the requirements for market housing within the area. Although this type of housing is not considered affordable housing, the 2013 SHMA Review model presumes that the private rented sector can meet some of the identified needs, through rent subsidies and benefits and so can be a means of meeting some requirements. The SHMA also shows that the proportion of those households which claim housing benefit while living in the private rented sector are higher within Newham, Waltham Forest and Hackney than the national and London averages, so the role of this sector within the area could be important.
- 10.9 This form of accommodation should, subject to specialist viability testing, provide affordable rented housing in accordance with Policy H.3 of the Local Plan.

*Soundness test summary*

- 10.10 This policy is justified in its aims of providing a greater supply of private rented dwellings, which can provide benefits in terms of meeting housing requirements, and enable people to remain within the locality for the long-term. This role is supported within the evidence within the SHMA Review, 2014 in terms of its role in meeting affordable requirements. The alternative of not having a policy for this model of housing delivery has been discounted as this would not provide the opportunity to clarify that affordable housing policy requirement continue to apply to this form of housing.

## Appendix 1: Growth Borough Housing policies

The Growth Borough existing planning policy documents are the relevant housing policies until the Adoption of the Legacy Corporation's Local Plan. This document has referenced the broad policy approaches where appropriate, but the full details are to be contained within the following links.

### London Borough of Newham

The relevant policy for housing is within the Adopted Core Strategy (2012). Policy H1 Building Sustainable Mixed Communities sets out a target of 40,000 new homes within the plan period from 2011 to 2027. Policy H2 Affordable Housing sets out that on developments of over 10 units between 35 and 50 per cent will be affordable, comprising of 60 per cent social housing. The Council does not normally consider off-site provision.

See link for further details:

<http://www.newham.gov.uk/Documents/Environment%20and%20planning/CoreStrategy2004-13.pdf>

### London Borough of Hackney

The relevant policy for housing is within the Adopted Core Strategy (2010). This sets out a target of 22,460 new homes within the plan period from 2006 to 2026. Policy 20 Affordable Housing requires 50 per cent affordable housing on developments over 10 units, comprising of 60 per cent social housing and 40 per cent intermediate

See link for further details: <http://www.hackney.gov.uk/Assets/Documents/Adopted-LDF-Core-Strategy-final-incchaptimagescov-Dec2010-low-res.pdf>

### London Borough of Tower Hamlets

The relevant policy for housing is within the Adopted Core Strategy (2010). Policy SP02 sets out a target of 43,275 new homes within the plan period from 2010 to 2025. It aims for 50 per cent affordable homes over the plan period and a balance of tenures between social rented, affordable rent and intermediate housing should be provided.

See link for further details: <http://www.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf>

### London Borough of Waltham Forest

The relevant policy for housing is within the Adopted Core Strategy (2012). Policy SP02 sets out a target of 10,320. It also requires between 35 and 50 per cent affordable homes on developments of over 10 units, comprising of 70 per cent social rented and 30 per cent intermediate.

See link for further details: <http://www.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf>

## Appendix 2: Housing Trajectory table

Application no	Name	Zone name	Numbers	2015	2015-2019	2020-2024	2025-2029	2030-2035
<b>11/90621</b>	LCS	Zone 1 Stratford Waterfront East	1787			893	894	
		Zone 2 Stratford Waterfront West	878			439	439	
		Zone 4 Sweetwater	663		332	331		
		Zone 5 East Wick	864		432	432		
		Zone 6 Chobham Manor	828		400	428		
		Zone 8 Pudding Mill/Bridgewater Road	1311			656	655	
		Zone 12 Rick Roberts Way	398			199	199	
<b>07/90023/VARODA</b>	Stratford City	Zone 1 Cherry Park	1105		276	453	376	
		Zone 2 The International Quarter	333		333			
		Zones 3 to 5	4944	2818	709	709	708	
<b>12/00146/FUM</b>	Chobham Farm		1036		798	238		
<b>10/90285/FUMODA</b>	Manhattan Lofts		248		248			
<b>12/00336/LTGOUT</b>	Strand East (Sugar House Lane)		1200		852	348		
<b>11-070-FUL/PA/02423</b>	Bromley by Bow North Site		741		371	370		
<b>13/00275/VAR</b>	Contribution of Angel Lane towards Angel Lane/Cherry Park		119			119		

<b>10/02291/FUL</b>	2-12 High Street		191		191			
<b>12/00221/FUM</b>	Site bordering Great Eastern Road and Angel Lane		759		759			
<b>11/90619/FUMODA</b>	Porsche Garage, 68-70 High Street, Stratford		173		173			
<b>11/90618/FUMODA</b>	Corner of Westfield Avenue, Stratford City		951		951			
<b>12/00210/OUT</b>	Neptune Wharf		522		261	261		
<b>2009/1578</b>	St Mary of Eton Church		27		27			
<b>13/00204/FUM</b>	Monier Road		71		71			
<b>NEWCON/07/00026</b>	Station House	<i>Small site</i>	220		220			
<b>06/90011/FUMODA</b>	Stratford Edge , 80-92 High Street	<i>Small site</i>	202		202			
	Small sites COU	<i>Small site</i>	119	119				
<b>13/00404/FUM</b>	Alumno, 206-214 High Street	<i>Small site</i>	431		431			
<b>TOTAL with permission</b>			<b>20121</b>	<b>2937</b>	<b>8037</b>	<b>5876</b>	<b>3271</b>	<b>0</b>

Column1	Numbers	to 2015	2015-2019	2020-2024	2025-2029	2030-2035
<b>Sub Area 1</b>	2334	0	179	795	944	416
<b>Sub Area 2</b>	0	0	0	0	0	0
<b>Sub Area 3</b>	629	0	0	72	389	168
<b>Sub Area 4</b>	1206	0	0	894	207	105
<b>Total</b>	<b>4169</b>	<b>0</b>	<b>179</b>	<b>1761</b>	<b>1540</b>	<b>689</b>

	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Projected Completions	1469	1469	1643	1643	1643	1643	1643	1527	1527	1527	1527	1527	962	962	962	962	962
Annual requirement	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471	1471
Cumulative target	1471	2942	4413	5884	7355	8826	10297	11768	13239	14710	16181	17652	19123	20594	22065	23536	25007
Cumulative delivery	1469	2937	4580	6223	7867	9510	0	12713	14274	15834	17395	18955	19950	20945	21941	22936	23931
Above/below housing target	-3	-5	167	339	512	684	856	945	1035	1124	1214	1303	827	351	-124	-600	-1076

Manage	1471	1471	1471	1459	1445	1428	1409	1385	1366	1342	1310	1269	1210	1264	1354	1533	2071
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The manage approach is calculated by offsetting delivery rates against the target over the whole of the plan period. This is done by dividing the amount of completions which exceed the housing target by the remainder of the plan period, and subtracting this from the annual target. For example, the data shows that over-delivery of 167 units within the year 2015/16 means that only 1,459 need to be delivered in the subsequent year to meet the target over the rest of the plan period (calculated as  $167/14$  years of the plan period = 12 units), which is the target of 1471 minus 12. The graph shows that the cumulative over-delivery to 2028/29 means that the housing target does not need to rise above the set 1471 until 2027/28.



## Appendix 3- Five Year Housing Land Supply

### All sites within first 5 years

Application no	Name	Zone	Total	Years 1-5	Status
11/90621	LCS	Zone 4 Sweetwater	663	332	
		Zone 5 East Wick	864	432	
		Zone 6 Chobham Manor	828	400	Under Construction
07/90023/VAROD A	Stratford City	Zone 1 Cherry Park	1105	276	
		Zone 2 TIQ	333	333	Under Construction
		Zones 3 to 5	4944	709	Under Construction
12/00146/FUM	Chobham Farm		1036	798	Under Construction
10/90285/FUMOD A	Manhattan Lofts		248	248	
12/00336/LTGOUT	Strand East (Sugar House Lane)		1200	852	
11-070-FUL/PA/02423	Bromley by Bow North Site		741	371	
10/02291/FUL	2-12 High Street		191	191	
12/00221/FUM	Site bordering Great Eastern Road and Angel Lane		759	759	Under Construction
11/90619/FUMOD A	Porsche Garage, 68-70 High Street, Stratford		173	173	
11/90618/FUMOD A	Corner of Westfield Avenue, Stratford City		951	951	Under Construction
12/00210/OUT	Neptune Wharf		522	261	
2009/1578	St Mary of Eton Church		27	27	Under Construction
13/00204/FUM	Monier Road		71	71	
NEWCON/07/00026	Station House		220	220	Under Construction
06/90011/FUMOD A	Stratford Edge , 80-92 High Street		202	202	
13/00404/FUM	Alumno, 206-214 High Street		431	431	
<b>TOTAL</b>			15,509	8,037	

Five year housing land supply- 7,355

Five year housing land supply plus 5 per cent-7,723

8,037 equal to 5.2 years supply, a surplus requirement of 682, or 314 above the 5 per cent buffer. This is an average of over provision of 63 units per year. Meaning have flexibility of 63 units per year to be able to meet overall housing target.

There are as at July 2014 of 4,197 units under construction which amounts to 2.72 years worth of housing supply (including the buffer).

### Sites under construction included within the first five years

Name	Within Years 1-5	Indicative annual breakdown				
		2015/16	2016/17	2017/18	2018/19	2019/20
Legacy Communities Scheme Zone 6- Chobham Manor	400	80	80	80	80	80
Stratford City Zone 2- The International Quarter	333		111	111	111	
Stratford City Zones 3-5	709	400	309			
Site bordering Great Eastern Road and Angel Lane	759	759				
Corner of Westfield Avenue, Stratford City		951				
Station House	220	220				
Chobham Farm	798	86	87	208	208	208
<b>Total</b>	<b>4170</b>	<b>2496</b>	<b>587</b>	<b>399</b>	<b>399</b>	<b>288</b>

### Sites within the first five years not currently under construction

<b>Legacy Communities Scheme Zone 4- Sweetwater</b>			
Application Number/Type	11/90621 Outline	Number of units	Total- 663
Details	New neighbourhood within Queen Elizabeth Olympic Park of 663 units with associated retail, employment and community uses.		
Constraints/other factors	Accelerated delivery from timescale within initial outline scheme. Shortlisting of developers by the Legacy Corporation and selection of the development partner in Autumn 2014 will ensure ability to deliver within the first five years of the Plan period. Certainty surrounding provision and timescales is great. Detailed planning permissions required.		
Expected commencement		Phasing	Years 1-5- 332
Completion of all units	By 2024		

<b>Legacy Communities Scheme Zone 5- East Wick</b>			
Application Number/Type	11/90621 Outline	Number of units	Total- 864
Details	New neighbourhood within Queen Elizabeth Olympic Park of 864 units with associated retail, employment and community uses.		
Constraints/other factors	Accelerated delivery from timescale within initial outline scheme. Shortlisting of developers by the Legacy Corporation and selection of the development partner in Autumn 2014 will ensure ability to deliver within the first five years of the Plan period. Certainty surrounding provision and timescales is great. Detailed planning permissions required.		
Expected commencement		Phasing	Years 1-5- 432

Completion of all units	By 2024
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<b>Stratford City Zone 1- Cherry Park</b>			
Application Number/Type	07/90023/VARODA	Number of units	Total-1105 (1224 from outline permission minus 119 to be delivered at Angel Lane)
Details	Development of 1,105 residential units within the town centre boundary.		
Constraints/other factors	Detailed planning permissions required.		
Expected commencement		Phasing	Years 1-5 - 226
Completion of all units	By 2029		

<b>Manhattan Loft Gardens</b>			
Application Number/Type	10/90285/FUMODA	Number of units	248
Details	Forty-two storey building of 248 residential units with hotel and retail floorspace.		
Constraints/other factors			
Expected commencement	2015	Phasing	Years 1-5- 248
Completion of all units	By 2020		

<b>Strand East (Sugar House Lane)</b>			
Application Number/Type	12/00336/LTGOUT	Number of units	1200
Details	Mixed use development containing 1200 residential units, business, hotel and retail space.		
Constraints/other factors	Full permission for 8 units and detailed permission required for the remaining 1192 units. Reserved matters applications expected early 2015 and construction expected to start later in 2015.		
Expected commencement	2015	Phasing	Years 1-5- 852
Completion of all units	By 2024		

<b>Bromley by Bow North Site</b>			
Application Number/Type	11-070-FUL/PA/02423	Number of units	741

Details	Mixed use development comprising 741 residential units, business and retail floorspace.		
Constraints/other factors	Phase 1 of the development (291 units) expected to commence by end of 2014.		
Expected commencement	2014	Phasing	Years 1-5- 371
Completion of all units	By 2024		

### **2-12 High Street**

Application Number/Type	10/02291/FUL (10/90519/FUMODA)	Number of units	191
Details	Development of 191 residential units and commercial floor space		
Constraints/other factors	Through discussion with the developers it is believed that construction will commence in late 2015.		
Expected commencement	2015	Phasing	Years 1-5- 191
Completion of all units	By 2020		

### **Porsche Garage, 68-70 High Street, Stratford**

Application Number/Type	11/90619/FUMODA	Number of units	173
Details	Development of 173 residential units and commercial floor space		
Constraints/other factors	Through discussion with the developers it is believed that construction will commence in 2015/16.		
Expected commencement	2015/16	Phasing	Years 1-5- 173
Completion of all units	By 2020		

### **Neptune Wharf**

Application Number/Type	12/00210/OUT	Number of units	522
Details	Comprehensive mixed use development of 522 units, retail, business and community uses.		
Constraints/other factors	Detailed permission required. Through discussion with the developers it is believed that construction will commence in 2015.		
Expected commencement	2015	Phasing	Years 1-5- 261
Completion of all units	By 2024		

### **Monier Road**

Application	13/00204/FUM	Number of units	71
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Number/Type			
Details	Development of 71 residential units.		
Constraints/other factors	Full permission granted. Through discussion with the developers it is believed that construction will commence in 2015.		
Expected commencement	2015	Phasing	Years 1-5- 71
Completion of all units	By 2020		

<b>Stratford Edge , 80-92 High Street</b>			
Application Number/Type	06/90011/FUMODA	Number of units	Total- 202
Details	Residential development of 202 units with business and retail floorspace.		
Constraints/other factors	Full permission granted. Through discussion with the developers it is believed that construction will commence in 2015.		
Expected commencement	2015	Phasing	Years 1-5- 202
Completion of all units			

<b>Alumno, 206-214 High Street</b>			
Application Number/Type	13/00404/FUM	Number of units	431
Details	431 student units with retail and business floorspace.		
Constraints/other factors	Full permission granted. Through discussion with the developers it is believed that construction will commence in 2015.		
Expected commencement	By 2020	Phasing	Years 1-5- 431
Completion of all units	2020		

## Appendix 4: Broad housing locations (Years 6 to 15)

<b>Years 6 to 10</b>	
Legacy Communities Scheme- Zones 1, 2, 4, 5, 6, 8 and 12.	Site in LLDC ownership and with a phased planning permission
Stratford City- Zones 1, 3 and 5	Site is available and has a phased planning permission (with initial phases already implemented)
Chobham Farm	Site is available and has a phased planning permission (with initial phases already being implemented)
Strand East (Sugar House Lane)	Site is available, has planning permission and developer commitment to proceed
Bromley by Bow North Site	Site is available, has planning permission and developer commitment to proceed
Contribution of Angel Lane towards Angel Lane/Cherry Park	Site is available and has a phased planning permission (with initial phases already implemented)
Neptune Wharf	Site is available, has planning permission and developer commitment to proceed
Hackney Wick and Fish Island	Locations where redevelopment pressure is high Area includes allocated sites
Bromley-by-Bow South	Locations where redevelopment pressure is high Area includes allocated sites
Parts of Pudding Mill	Locations where redevelopment pressure is high Area includes allocated sites
South of Sub-Area 3	Locations where redevelopment pressure is high Area includes allocated sites
<b>Years 10 to 15</b>	
Legacy Communities Scheme- Zones 1, 2, 8 and 12.	Site in LLDC ownership and with a phased planning permission
Stratford City- Zones 1, 3 and 5	Site is available and has a phased planning permission (with initial phases already implemented)
Hackney Wick and Fish Island	Locations where redevelopment pressure is high
Parts of Pudding Mill	Locations where redevelopment pressure is high Area includes allocated sites
South of Sub-Area 3	Locations where redevelopment pressure is high
South of Sub Area 4	Locations where redevelopment pressure is high
Stratford High Street and environs	Locations where redevelopment pressure is high and landowner commitment Area includes allocated sites

## Appendix 5: Glossary

**Affordable housing** Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision (NPPF).

**Affordable Rented Housing** Let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable) (NPPF).

**Density** In relation to residential developments, a measurement of the number of dwellings per hectare.

**Family housing** Generally defined as having three or more bedrooms.

**Greater London Authority (GLA)** The GLA is the strategic citywide government for London. It is made up of a directly elected Mayor (the Mayor of London) and a separately elected Assembly (the London Assembly).

**Growth Boroughs** Barking and Dagenham, Greenwich, Hackney, Newham, Tower Hamlets and Waltham Forest (the four Boroughs over which the Legacy Corporation area sits are Newham, Hackney, Tower Hamlets and Waltham Forest).

**Gypsy and travellers' sites** These are sites either for settled occupation, temporary stopping places, or transit sites for people of nomadic habit of life, such as travellers and gypsies.

**Houses in Multiple Occupation (HMOs)** Small shared dwelling houses occupied by between three and six unrelated individuals as their only or main residence, who share basic amenities such as a kitchen or bathroom.

**Intermediate housing** Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not Affordable Rented housing.

**Legacy Corporation's Legacy Communities Scheme** The Legacy Communities Scheme sought permission for the long-term development of five new neighbourhoods within Queen Elizabeth Olympic Park. Planning Application Reference: 11/90621/OUTODA (LLDC webpage).

**Social Rented Housing** Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency (NPPF).

**Specialised Housing** Housing which meets the specialised housing needs of groups such as the elderly and disabled people.

**Strategic Regeneration Framework (SRF)** The regeneration framework of the six Growth Boroughs (first published in October 2009), which sets out an agreed framework for achieving the goal of 'convergence'. It identifies seven key themes:

- Create a coherent and high-quality city within a world city region
- Improved educational attainment, skills and raising aspirations
- Reducing worklessness, benefit dependency and child poverty
- Homes for all
- Enhancing health and wellbeing
- Reducing serious crime rates and anti-social behaviour
- Maximising sports legacy and increasing participation



## Appendix 6: References

National Planning Policy Framework (Communities and Local Government, 2012)  
London Plan (Greater London Authority, 2011)  
Revised Early Modifications and Alterations to the London Plan (Greater London Authority, 2013)  
Draft Further Alterations to the London Plan (Greater London Authority, 2014)  
Strategic Housing Land Availability Assessment (Greater London Authority, 2013)  
Strategic Housing Market Assessment (Greater London Authority, 2013)  
London Gypsy and Traveller Accommodation Assessment (Greater London Authority, 2008)  
Mayor's Housing Supplementary Planning Guidance (Greater London Authority, 2012)  
Mayor's Draft Housing Strategy (Greater London Authority, 2013)  
Olympic Legacy Supplementary Planning Guidance (Greater London Authority, 2012)  
The Role of the Planning System in Delivering Housing Choices for Older Londoners (Greater London Authority, 2012)  
Authority Monitoring Report (London Legacy Development Corporation, 2014)  
Strategic Housing Market Assessment Review (Opinion Research Services on behalf of London Legacy Development Corporation, 2013)  
Gypsy and Traveller Accommodation Needs Assessment (Opinion Research Services on behalf of London Legacy Development Corporation, 2014)  
Gypsy and Traveller Site Assessment (Peter Brett Associates on behalf of London Legacy Development Corporation, 2014)  
Affordable Housing Viability Testing (BNP Paribas on behalf of London Legacy Development Corporation, 2013)  
Combined Policy Viability Study (BNP Paribas on behalf of London Legacy Development Corporation, 2014)  
Schools Mapping Study (Quod on behalf of London Legacy Development Corporation, 2013)  
Infrastructure Delivery Plan Study Report (URS on behalf of Legacy Development Corporation, 2013)  
Local Open Space Review (London Legacy Development Corporation, 2014)  
Factsheet no. 6 (Housing Learning and Improvement Network, 2008)  
Strategic Housing Market Assessment (Fordham Research on behalf of London Borough of Hackney, 2009)  
Strategic Housing Market Assessment (Opinion Research Services on behalf of London Borough of Newham, 2010)  
Strategic Housing Market Assessment (David Couttie Associations on behalf of London Borough of Tower Hamlets, 2009)  
Strategic Housing Market Assessment (Opinion Research Services on behalf of London Borough of Waltham Forest, 2012)  
East London Strategic Housing Market Assessment (Opinion Research Services on behalf of East London Boroughs, 2010)  
East London HMO Standards (2009)  
Population Projections (Greater London Authority, September 2013)