

Examination - London Legacy Development Corporation Local Plan 2015 to 2031

Inspector's Matters, Issues and Questions

Matter 3: Housing

***Issues:** Whether the Local Plan, notably section 5, is consistent with the National Planning Policy Framework's aims to boost significantly the supply of housing and deliver a choice of high quality homes to meet the needs of different population groups; whether the Local Plan is in general conformity with the London Plan and Draft Further Alterations to it.*

Questions:

Housing Numbers

1. Bearing in mind the recent Inspector's report following the Further Alterations to the London Plan (FALP) examination (see paragraphs 31-35 of that report), is there any case for the LLDC to have carried out its own strategic housing market assessment and calculated its own objectively assessed need for housing?
2. The Housing Position Statement LD/28, and Background Paper TBP/04, contain much useful information. Should the Local Plan include more detail about the derivation of numbers, perhaps explaining how its target relates to the needs and requirements of the Boroughs which make up the LLDC area?
3. Some representors refer to a loss of homes to accommodate the Olympic & Paralympic Games facilities. Is there a case for a boost in the FALP housing numbers because of the area's recent history? Or does the need to avoid the loss of employment land and secure balanced, sustainable development maximising the legacy of the Games count against this suggested approach?
4. Paragraph 5.1 and Objective 2 of the Local Plan refer to building "about" or "approximately" 24,000 new homes by 2031. The table of minor amendments and corrections, LD/26, indicates a change in Objective 1 to refer to "more than 24,000". Presumably a change to Objective 2 is intended? Would this make the plan appropriately more positive, and consistent with the text in paragraph 5.3?
5. Is there sufficient consistency and clarity in the figures for new housing provision over the plan period? Policy SP.2 seeks to deliver in excess of 1,471 units per annum (totalling 23,536 over the period 2015-31), which reflects the monitoring targets for 2015-25 in Table 3.1 of the FALP. However, footnote 21 on Page 43 of the Local Plan gives figures of 22,065 and 25,007.
6. What is the status of "Homes for London, The London Housing Strategy" [Doc S/01]? Is it a DPD or SPG, and is it still a "Draft for London Assembly"? Is the LLDC Local Plan consistent with the approach and policies for housing delivery which are set out?

7. The NPPF expects local planning authorities to identify and update annually a supply of specific deliverable sites to provide 5 years worth of housing etc. (paragraph 47). Is the Local Plan consistent with the NPPF on 5 year supply [see TBP/04]? Is there any substantive evidence to support use of a 20% instead of 5% buffer?
8. Why exactly may it not be possible to demonstrate a 5 year supply on a rolling basis, as paragraph 5.3 suggests?
9. Do the proposed changes to paragraph 5.3 in LD/26 satisfy concerns of the GLA and strengthen the commitment to monitoring and reviewing appropriately?
10. Figure 9: Housing Trajectory shows a drop in housing completions in 2025/6 and again in 2030/31. Does this reflect the reliance on recycled land in London, referenced in paragraph 3.19a of the FALP, which makes it difficult to identify sites and even broad locations where sustainable development might be expected in the longer term? Or does it indicate a likely future lack of supply which requires more positive planning now?
11. Should the more recent housing trajectory in the Housing Position Statement replace Figure 9?

Policies H1 to H7 – a mix of housing types, affordable housing and housing for different population groups

12. Are these policies in general conformity with policies 3.8 & 3.9 of the London Plan and FALP?
13. Is Policy H1 consistent with the policies of constituent London Boroughs (eg. LB of Newham target for 39% family housing)? Does it adequately reflect the diversity of housing needs in East London identified in SHMAs and referred to in Background Paper TBP/04?
14. Should Policy H1 include more specific targets for different types and size of dwelling?
15. Does criterion 1 of Policy H1 imply that all development proposals in all locations should include a mix of housing types and, if so, is this feasible? If not, how will the achievement of an appropriate mix across the Corporation area be secured?
16. Is there any evidence now that Policy H1 is too inflexible to deal with changing needs over time? If so how should this be addressed?
17. There is a potential conflict between boosting housing supply to secure the maximum number of new units and achieving the optimum dwelling mix which will secure lifetime neighbourhoods? Does the Local Plan address this matter adequately?
18. Does Policy H2 conform with Policy 3.11 of the London Plan on affordable housing?

19. The Housing Background Paper, TBP/04, explains the links between Policy SP2 seeking a minimum of 455 affordable units pa, Policy H2 which will maximise affordable housing provision on sites of 10 dwellings or more, and paragraph 5.13 which describes a minimum target of 35%. Should Policy H2 be more positive in seeking a specified level or percentage of affordable housing, or is its wording justified by the need for some flexibility?
20. Is there any evidence that affordable housing policy is not supported by robust and up-to-date evidence of viability? Is the reference to using 35% as a minimum to commence discussions on individual schemes justified?
21. Is there some inconsistency between (i) the LLDC approach with 35% affordable housing, and a 60/40 split between affordable & social rent and intermediate housing, and that of (ii) the Host Boroughs eg. the LB of Tower Hamlets seeks 50% affordable housing and a 70/30 tenure split? What are the likely consequences of the differences? Will there be flexibility in the split between affordable types on individual sites?
22. Notwithstanding concerns about the concept of affordable rented housing with rents no more than 80% of market value, is there any evidence that Policy H2 and paragraph 5.14 are unsound or inconsistent with national policy? The NPPF Glossary defines affordable rented housing.
23. Is there substantive evidence that paragraph 5.15 regarding scheme viability over time is unsound?
24. Should the Local Plan indicate that the provision of affordable workspace could offset the provision of affordable housing, as suggested by some representors?
25. Is Policy H3 in conformity with Policy 3.8 of the London Plan and the text which follows that policy? In allowing provision of new specialist old persons' accommodation, is Policy H3 positive enough? Should there be more specific targets for positive planning and to aid monitoring?
26. With proposed changes to wording in LD/26, removing references to "conventional" housing from Policies H3-H6, are the purposes of these policies clear?
27. Is Policy H4 in conformity with paragraphs 3.52 onwards of the London Plan and FALP? Could the policy give rise to over-provision of student accommodation with over-concentration resulting in adverse impacts on existing communities?

28. Should the policy be more specific as to what over-concentration means, when adverse amenity impacts would be "unacceptable", and what amounts to "affordable student provision"?
29. Is Policy H5 consistent with Planning policy for traveller sites, March 2012, DCLG? Has the Legacy Corporation:
- Carried out early and effective community engagement with settled and traveller communities in assembling the evidence base (Policy A);
 - Set pitch targets and identified a supply of specific sites – deliverable for the first five years, and developable or as broad locations thereafter (Policy B);
 - Set criteria which are fair and facilitate the traditional, nomadic life of travellers while respecting the interests of the settled community?
- If not, how can the deficiencies be remedied?
30. The Background Paper, TBP/04, and Housing Position Statement, LD/28, record the LLDC's work to date. Has any further progress, since the Local Plan was submitted, been made eg. working with neighbouring authorities to meet the need for gypsy & traveller accommodation which, paragraph 5.25 suggests, cannot be satisfied within the LLDC area?
31. Is Policy H6, Houses in Multiple Occupation (HMO), out of line with LB Newham's policy which resists the conversion of family housing to HMO unless exceptional circumstances prevail? Does paragraph 5.28 imply a more restrictive approach to HMOs than Policy H6, amounting to new 'policy' rather than 'reasoned justification'?
32. As the Mayor's Housing SPG [RP/07] does not apply the design standards to HMOs (see paragraph 2.1.14), should the standards for internal and residential amenity be made clearer in the Local Plan?
33. Should the justification for seeking affordable housing when HMOs or private rented housing are provided be explained more fully or is paragraph 5.31 sufficient?
34. Is there any substantive evidence that Policy H7 – 4. including a mechanism to secure accommodation as private rented for the longer term is unreasonable?

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Potential participants [29]:

Respondent Reference Number	Respondent Name and Organisation
REP.LP.008	Hannah Clifton, London Borough of Newham
REP.LP.017	Ilinca Diaconescu, LGTU
REP.LP.018	Marian Mahoney
REP.LP.019	Tracie Giles
REP.LP.021	James Stevens, HBF
REP.LP.022	Tony Tapley, RPS Planning on behalf of Westfield Shoppingtowns Limited
REP.LP.023	Michael Holloway, Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd
REP.LP.024	Warren Lubin
REP.LP.029	GL Hearn on behalf of Danescroft Land Limited
REP.LP.033	Steffan Rees, Quod on behalf of QDD Athletes Village UK Limited
REP.LP.036	Owen Whalley, LB Tower Hamlets
REP.LP.037	Julian Cheyne
REP.LP.046	Osita Madu
REP.LP.047	Katie Glasgow, London Borough of Hackney
REP.LP.049	Ulrike Steven, What if:projects Ltd
REP.LP.051	Victor Adegbuyi, Newham Union of Tenants
REP.LP.053	DP9
REP.LP.057	Diana Thomson, Savills
REP.LP.058	Austin Mackie on behalf of British Telecom
REP.LP.067	Francis Basset, Newham Friends of Earth
REP.LP.071	Gerald Eve LLP, Sulzer Dowding
REP.LP.072	Montagu Evans on behalf of Constable Homes Limited.
REP.LP.074	Karen Tang on behalf of Acme Studios
REP.LP.079	GVA on behalf of Workspace Group Limited
REP.LP.087	Joseph Alexander
REP.LP.089	GLA
REP.LP.091	London Tenants Federation
REP.LP.096	Just Space
REP.LP.121	Rev. David Richards