

TBP2

LEGACY
DEVELOPMENT
CORPORATION

HOUSING BACKGROUND PAPER

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1. BACKGROUND AND KEY ISSUES

The Legacy Corporation Local Plan was adopted in July 2015. The Inspector's Report (9th July 2015) highlighted a number of matters in relation to housing delivery, endorsing a commitment to monitor and keep under review progress in seeking to achieve and, where possible, exceed the housing target of 1471 per annum. In December 2017 the Mayor of London published his draft of the new London Plan (2019-2041) which included new, more ambitious housing targets of 2161 per annum for the Legacy Corporation area.

In relation to planning for gypsies and travellers the Inspector's report emphasised the need for close monitoring of progress against the five-year supply of sites with measures introduced should delivery fall behind schedule. The Local Plan also needs to be kept up to date with this respect, to take account of changes to the definition of gypsies and travellers and direction from the Mayor in his draft New London Plan (2017).

Section 5 of the Local Plan contains policies related to housing and neighbourhoods, including community infrastructure; this background paper deals with matters relating to housing only. In light of changes to national and regional policy and evidence updates from the Housing Requirements Study Section 5 has undergone considerable changes and re-writes. Changes to national and regional planning policy including NPPF and London Plan definitions of affordable housing also need reflecting in the Local Plan. This background paper sets out the rationale for these proposed changes; highlights and discusses key issues; and explains how the Legacy Corporation seeks to meet its requirements.

2. LEGISLATIVE AND POLICY CONTEXT

Since the adoption of the Local Plan in 2015 a number of key policy changes have taken place, most notably the proposed changes to the NPPF but also at the regional level with the preparation of the draft New London Plan. These all have a number of implications for the preparation of the Local Plan housing policies as set out below.

The revised [National Planning Policy Framework \(2018\)](#) includes a number of new measures in relation to housing policy. The most significant reform proposals are the introduction of the standard method for calculating housing need, the Housing Delivery Test and new definitions of affordable housing and "deliverable". Section 4 of this Paper sets out how the [Housing Requirements Study \(2018\)](#) has taken into account the proposed methodology for calculating OAN.

The NPPF introduces the new Housing Delivery Test. This applies standardised methodologies to measure delivery on a rolling-three year basis. Delivery will be considered substantially below target and the presumption in favour of sustainable development would apply where falling below:

- 25% of housing required at November 2018
- 45% of housing required at November 2019
- 75% of housing required at November 2020 and in subsequent years

Where delivery falls below 95% of the requirement local planning authorities will need to produce an Action Plan to help increase delivery. Planning authorities are still required to maintain a five-year supply of deliverable sites to deliver their housing requirements, and the new NPPF also introduces a varied buffer requirement for this. The buffer would normally be 5%; 10% where an authority wishes to demonstrate its supply through an annual

position statement; or 20% where there has been significant under-delivery of housing, defined as below 85% of the target.

The new NPPF definitions of affordable housing have been included in the Local Plan glossary. Other new measures introduced include reviewing housing need at least once every five years, promotion of small sites with 10% of sites to be of 1 hectare or less), only seeking affordable housing on major sites (10 or more units or sites of 0.5 ha in size or above), major development schemes must include 10% affordable home ownership (as defined within the NPPF) and sets out the ability to set a housing requirement figure for designated neighbourhood areas.

The NPPF also introduced a new definition of deliverable which means that sites should have a reasonable prospect of being delivered within five years. The definition is included within the Local Plan glossary and described in more detail within Section 6.1 below.

Draft New London Plan (2017) has an increased emphasis on housing delivery and in total policies combine to facilitate a step change towards circa 65,000 homes delivered per annum across London. Achieving 35% affordable housing is also key with a number of policies focussing on achieving this figure with clear viability requirements, referred to as the 'threshold approach' which sets out 35% and 50% thresholds at which relevant schemes do not need to provide detailed viability information. It also introduced new policy areas relating to supported accommodation and shared living. As a Mayoral body, the Legacy Corporation will be working to achieve housing and affordable housing delivery in accordance with this revised policy approach. These changes to the London Plan are therefore reflected within the substantive change to Section 5 of the Local Plan.

As a result of the anticipated timescale for adoption of the Local Plan, these revisions to it are being drafted to be in general conformity with the new London Plan. Therefore, detailed information on conformity with the 2016 London Plan is not provided in this note. Besides, the adopted Local Plan has already been confirmed to be in general conformity with this Plan.

London Plan Minor Suggested Changes (2018) made some minor amendments to the approach proposed within the draft New London Plan, including detail on housing targets beyond 2028/2029 and amendments in relation to small sites. In relation to affordable housing proposed changes reconfirm that major developments (of over 10 units) trigger affordable housing requirements and that industrial land should only provide 50% affordable housing where there is a net loss of industrial floorspace capacity. A number of other changes were also made to confirm the affordable housing requirements in relation to older persons, student housing and shared living.

Mayor's **Affordable Housing and Viability SPG (2017)** provides further detail in relation to the above, most notably the Fast Track Route where a scheme is policy-compliant and provides 35% affordable housing (without public subsidy), no viability review is required unless an agreed level of progress on site is not met in 2 years. It also sets out the considerations to maximise provision where schemes are unable to reach this level including some specific considerations in relation to Build to Rent whereby these schemes should provide London Living Rent on site, consider sector-specific mix requirements, potential for some flexibility in space standards.

Draft **London Housing Strategy (2017)** sets out the Mayor's preferred tenures of London Affordable Rent, London Living Rent and London Shared Ownership (see section 7). It also includes clear requirements for efficient management practices for Build to Rent with the overall aim of meeting housing needs of different communities, including supported requirements.

3. DUTY TO COOPERATE

The [Housing White Paper](#) had some implications in relation to the duty to cooperate, stating that local planning authorities should prepare statements of conformity on cooperation issues, to timetables set out within the NPPF. The NPPF has confirmed these requirements with the need to produce Statements of Common Ground covering strategic cross-boundary issues. The [Duty to Cooperate Background Paper \(2018\)](#) sets out how the Legacy Corporation has collaborated with the growth boroughs on all matters including housing. Work will continue on production of a statement of common ground to meet the NPPF and NPPG requirements.

4. EVIDENCE BASE

In Summer 2017 the Legacy Corporation conducted an extensive Household Survey of the area to be used to provide updated population projections for the Local Plan period to 2036 but also to provide, for the first time, detailed information on the profile of households within the LLDC area. This information including methodology is provided in detail within the [Population Projections Report \(2018\)](#). The Legacy Corporation is aware of the newly published Office for National Statistics household projections, as this only covers the boroughs this is not strictly relevant but believes that the projections used, being survey-based will be the most reliable for the area over the time period.

The Greater London Authority evidence ([Strategic Housing Market Assessment \(2017\) \(SHMA\), 2017](#)) considers London as a single Housing Market with a number of sub-areas. The Legacy Corporation's strategic delivery role remains significant, with the Housing Requirements Study (2018) utilising 8 different models for determining housing need, all of which were considerably below the housing delivery planned. Even by selecting the highest level of need identified (adopting the GLA Central trend with 2.4% vacancy and 20% market signals) the OAN identified is only 619 per annum for the area which is considerably lower than expected housing delivery and the annual housing target of 2161pa set out within the Draft New London Plan (2017).

However, the Legacy Corporation is also aware that the new household projections released in September 2018 will have implications of the levels of need generated by utilising the government's standardised methodology for calculating Objectively Assessed Need and that to compensate for this change, and to help deliver the 300,000 homes per annum by the mid-2020s some alterations to the methodology are likely to be proposed. It is anticipated that this change will have no impact for the Legacy Corporation is considered minimal as the MHCLG methodology (Model 7 within the Housing Requirements Study) generated need of just 382 for the area which is considerably below the 619 considered above and most crucially a small proportion of the anticipated housing delivery of 2161 per annum. Therefore any change to the methodology utilised to assess need is unlikely to deliver a need figure in excess of housing delivery planned and thus the Legacy Corporation will continue to utilise the figures contained within the Housing Requirements Study.

Due to the Legacy Corporation area not corresponding with any other administrative area, it was decided that a primary research base to local housing evidence would be most robust. The [Housing Requirements Study \(2018\)](#) utilised the Household Survey data to determine key local housing requirements as well as embedding a number of different housing models to determine the Objectively Assessed Need for the area, including that of the proposed MHCLG methodology. This confirmed that housing delivery within the area is contributing significantly to London-wide strategic housing requirements where delivery at 2161 per annum is considerably above the identified OAN of up to 619 per annum. This reinforces the [Local Plan \(2015\)](#) Inspector's view at

paragraph 23 that “it is clear to me that the Corporation will be helping to boost the supply of housing, to meet strategic London needs as well as those generated locally”. Therefore alongside the HRS the GLA’s [Strategic Housing Market Assessment \(2017\)](#) is of particular relevance to the area in relation to the housing size and mix requirements. The HRS also provides key evidence with respect to specialist housing requirements of settled and non-settled communities.

The Affordable Housing Viability Testing within the [Local Plan Viability Study \(2018\)](#) also forms a key part of the evidence base testing a number of different scheme types at different land values, determining where schemes are viable at different proportions and tenure mixes of affordable housing.

[Work Live Study \(2014\)](#)- Provides research and recommendations on combined live and work premises, including adopted planning policy position, potential market and affordability. Key issues, including social and placemaking opportunities, are illustrated and debated in a range of in-depth case studies.

The [Characterisation Study \(2018\)](#) provides detail relating to the character of the Legacy Corporation planning area and additionally highlights broad locations which can potentially yield residential capacity from small sites, defined as less than 0.25ha or through residential conversions

The GLA’s [Strategic Housing Land Availability Assessment \(2017\)](#) (SHLAA) assesses housing capacity across London which has informed the housing targets assigned through the Mayor’s draft New London Plan (2017) for each local planning authority.

5. KEY CHANGES

Table A.1 in Appendix 1 sets out an overview of changes to housing policies within the Local Plan with a brief explanation of the reason for the change and why this change was required. The key changes are set out below:

- Updated housing target and introduction of new measures to optimise housing delivery and enable the increased target to be met
- Maximising affordable housing delivery and tenure requirements through the Affordable Housing Threshold approach
- Housing size and mix and London Plan conformity
- Specialist accommodation and new housing products

This Background Paper will now discuss the key changes in detail and the implications of the change to the planning strategy.

5.1 OPTIMISING HOUSING DELIVERY

In accordance with the new London Plan the housing delivery target contained within SP.2 has been updated to 2161 per annum. This figure consists of delivery from larger strategic sites as contained within the GLA SHLAA, 2017; 80 dwellings per annum within small sites and 24 per annum from non-self-contained sites . Policy H.1 of the Local Plan has been updated to include measures introduced to optimise housing delivery on small sites.

As highlighted above the London Plan puts a much greater emphasis on housing delivery from small sites and conversions. The **Characterisation Study (2018)** provides a clear analysis of the Legacy Corporation area, meeting the requirements of new London Plan Policy D2. This information is also valuable in relation to anticipating the amount of development which can be brought forward through small sites. Based upon historical delivery rates and character analysis, the Draft New London Plan's housing delivery target for the Legacy Corporation area anticipates around 800 homes could come forward on small sites and conversions over a 10-year basis. The Characterisation Study helps identify where delivery from small sites and conversions are considered more likely. Although the Draft New London Plan encourages inclusion of the small sites presumption in the first five years of the plan period, the Legacy Corporation is of the view that the new measures contained within the Draft New London Plan and corresponding changes to Policy H.1 of the Revised Local Plan to increase delivery from small sites will take time to bed in on the ground. Accordingly no such allowance for delivery of new homes on small sites has been made within the Local Plan for this period. Instead 80 units per annum has been assumed from 2025 onwards to the end of the plan period (2036). Further detail on the housing trajectory is contained within Section 6.1 of this Background Paper. Policy H.1 has been amended to facilitate a growth in delivery from small sites by highlighting tools such as the Characterisation Study, Brownfield Register and PTAL mapping to identify particular locations where additional housing capacity may be yielded. The policy has also been amended to set out where delivery on small sites and conversions will be supported. It is anticipated that these measures will help ensure a step change in delivery levels across the plan period.

The London Plan housing target also assumed delivery of around 240 non-self-contained housing units for a ten-year period, which on the basis of student accommodation would amount to up to 720 student bedspaces. As highlighted in section 8.3 below, delivery from student housing has been historically high, should this trend continue it is anticipated that non-self-contained accommodation could provide in excess of what is anticipated within the target. Combined with policies relating to the role of the Metropolitan Centre at Stratford within Section 4 of the Local Plan will mean that student accommodation is likely to play an increasingly key role of introducing a greater diversity to accommodation within and adjacent to the centre. In accordance with the London Plan student homes will be monitored on a 3:1 basis, and the Local Plan sets out clear monitoring arrangements for other new housing products that have similar characteristics.

Policies in the London Plan have been amended to boost housing delivery from a variety of sources alongside optimising housing delivery. Amendments to Policy H.1 set out in detail how the supply will be diversified including from small sites. However, to contribute to strategic housing delivery amendments to the supporting text to Policy SP.2 include welcoming of innovative site-assembly approaches such as over-station development (see paragraph 5.3). Any delivery from such sources is likely to only be in the latter part of the plan period.

5.2 HOUSING TRAJECTORY

The updated **National Planning Policy Framework (2018)** has introduced a number of new measures but also made a number of amendments to the way in which a five-year housing land supply should be calculated, with options to have this ‘confirmed’. Paragraph 73 sets out that LPAs should have a 5% buffer of deliverable sites but also have the option to have their supply confirmed on an annual basis or through a recently adopted plan where a 10% buffer can be demonstrated through Paragraph 74. For the purposes of clarification, the Legacy Corporation is not seeking to have its five year housing supply confirmed through the examination of the plan. At this stage it is also not proposed to confirm the housing supply on an annual basis but the circumstances will remain under review and the Legacy Corporation would seek to do so should it be able to at any future date demonstrate a 10% buffer.

With respect to Paragraph 67 (a) the changes also include an amendment to the definition of “deliverable” which means that if an LPA relies on sites with outline permission in the first five years then detailed evidence must be provided to confirm that the housing completions will begin on site within five years. Sites which are not major development or sites with detailed planning permission should also be considered deliverable until permission expires unless there is clear evidence that homes will not be delivered with five years. Appendix 2 shows the source of all housing delivery within the area over the plan period broken down as the pre-adoption stages and the first five years of the plan period (2020-2024). For the purposes of clarification, at the time of writing therefore the ‘rolling five year supply’ relates to 2018-2022, however the first five years of the plan period relates to 2020-2024 (inclusive) and shows the sites which constitute the first five years of supply plus a 5% buffer.

With respect to the above, all sites with full planning permission have been included within the first five years, or for large and phased sites, have been spread over a number of phases. The Legacy Corporation has a proven track record of delivery (see below) and historically there have been very few housing permissions which have not come forward within the Legacy Corporation area. Therefore it is reasonable to assume that the sites with permission will begin to deliver housing completions within the first five years.

Table 1 shows overleaf which other sites are included within the first five years of with some additional justification. In many cases the Legacy Corporation acting in its role of local planning authority can be confident in the delivery of sites within the specified period as the Legacy Corporation also acts as the developer for a number of these sites. As well as the priority projects identified within the Plan the Legacy Corporation is also landowner and developer of a number of other sites within the area and is working collaboratively with other landowners to bring these sites forward.

Figure 1 below shows completions from 2014, with projections for 2018 and 2019. It shows that between 2014 and 2017 the Legacy Corporation delivered 6435 units, which is 1609 per annum or 580 in excess of the annual target. Therefore cumulative housing delivery is to target and a 5% buffer is appropriate, which has been applied within the Housing Trajectory within Figure 2.

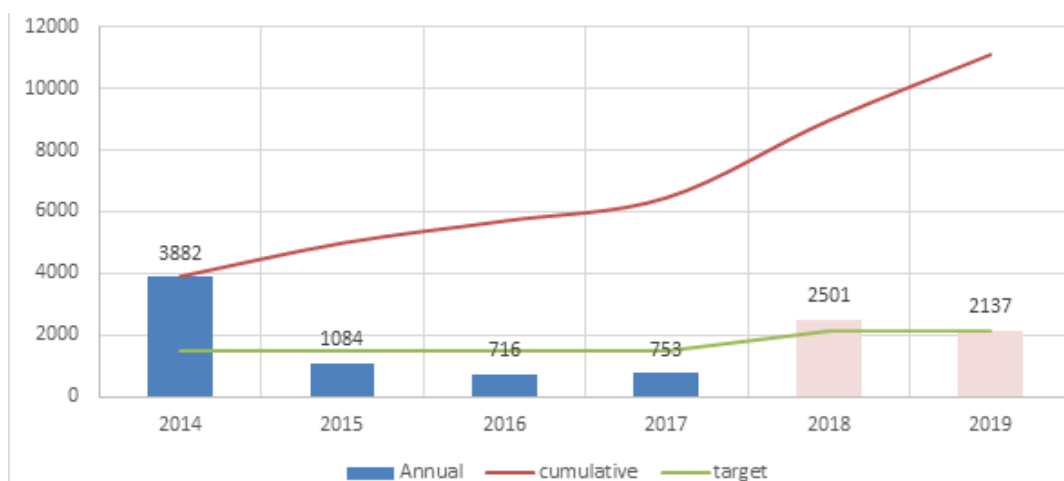


Figure 1- Housing Completions to 2019

Table 1

Ref.	Pre-adoption 2018-2019	First five yrs (2020-2024)	Notes
Allocations			
SA1.1	0	307	This site allocation has an outline permission 16/00166/OUT (approved subject to S106) covering the majority of the site and a number of other permissions covering a number of plots within the scheme. The Legacy Corporation is a landowner of a small part of the site but is working with the London Borough of Hackney and other landowners to bring forward a number of other plots within the area. Some of these plots are also subject to additional planning applications with decisions pending (for example, 39 units at Berkshire Road, 16/00704/FUL).
SA1.2	0	22	A small proportion of the total housing capacity of approximately 100 homes for this site has been included within the first five years, however in detail it is not anticipated that this would come forward until 2023. Given the location of the site and the propensity of similar sites all coming forward within the area it is considered that there is a 'reasonable prospect' that this site would come forward around this time.
SA1.3	0	9	The whole of this site allocation is subject to a hybrid permission granted (subject to S106) for 515 units (16/00451/OUT) of which 475 will be granted in full.
SA1.7	0	324	The Legacy Corporation is working together with the London Borough of Hackney, the GLA and TfL to bring forward this site. See Appendix 3.
SA3.4	0	356	The London Borough of Newham is working towards procuring a development partner for the delivery of this site. The latest position is available at this link: https://www.newham.gov.uk/Pages/ServiceChild/The-Carpenters-Estate-Stratford.aspx
SA4.1	76	441	The Legacy Corporation owns a site within this allocation and is currently working towards developing a scheme with adjacent landowners. It has also worked with all the respective landowners within this allocation to develop a Masterplan and the Bromley-by-Bow SPD has been adopted.
SA4.3	39	257	The Legacy Corporation is both landowner and developer of a core part of this site and is currently working up a revised Masterplan for the delivery of this scheme. Other parts of the site are subject to pre-application discussions.
SA4.4	0	6	A small proportion of housing capacity has been assigned to this site for the period however it is not anticipated that this would be until 2024. As the Legacy Corporation is also both landowner and developer of this site there is more than a 'reasonable prospect' that this site will start producing completions at this time.
Outline permissions			
LCS	832	3807	The Legacy Corporation is both landowner and developer of these sites (see Local Plan insert on 'Legacy Corporation's Priority Projects').
Stratford City	595	1540	There are a number of plots within this outline scheme which are also subject to reserved matters approval (e.g. 17/00045/REM for 524 units) and others are subject to pre-application discussions.
Strand East	98	535	A majority of the plots within this outline scheme are also subject to reserved matters approval, with two under construction, and the remaining are under determination.
Chobham Farm	110	502	Of the five zones within this outline scheme, one has been completed, one is under construction and another is subject to reserved matters approval. There are also some pre-application discussions for the next phase.
Neptune Wharf	164	280	A large proportion of this site has reserved matters approval and is currently under construction and only Phase 4 remains in outline only, which constitutes the delivery of a school rather than housing.
Additional capacity	35	2061	These sites relate directly to the phasing contained within the London SHLAA re-proportioned to the Local Plan periods. Due to this different phasing some sites which were assessed within the SHLAA as being deliverable in the GLAs phase 3 (i.e. 2024) crossover with the Legacy Corporation's Phase 1 and therefore are included here. In most of these cases these are large sites with some pre-application discussions and/or planning permissions submitted. For example an application for 145 homes has been made on the Telerail Trillion site in Fish Island which is in line with the GLA's SHLAA capacity assumptions in quantum and timescale.

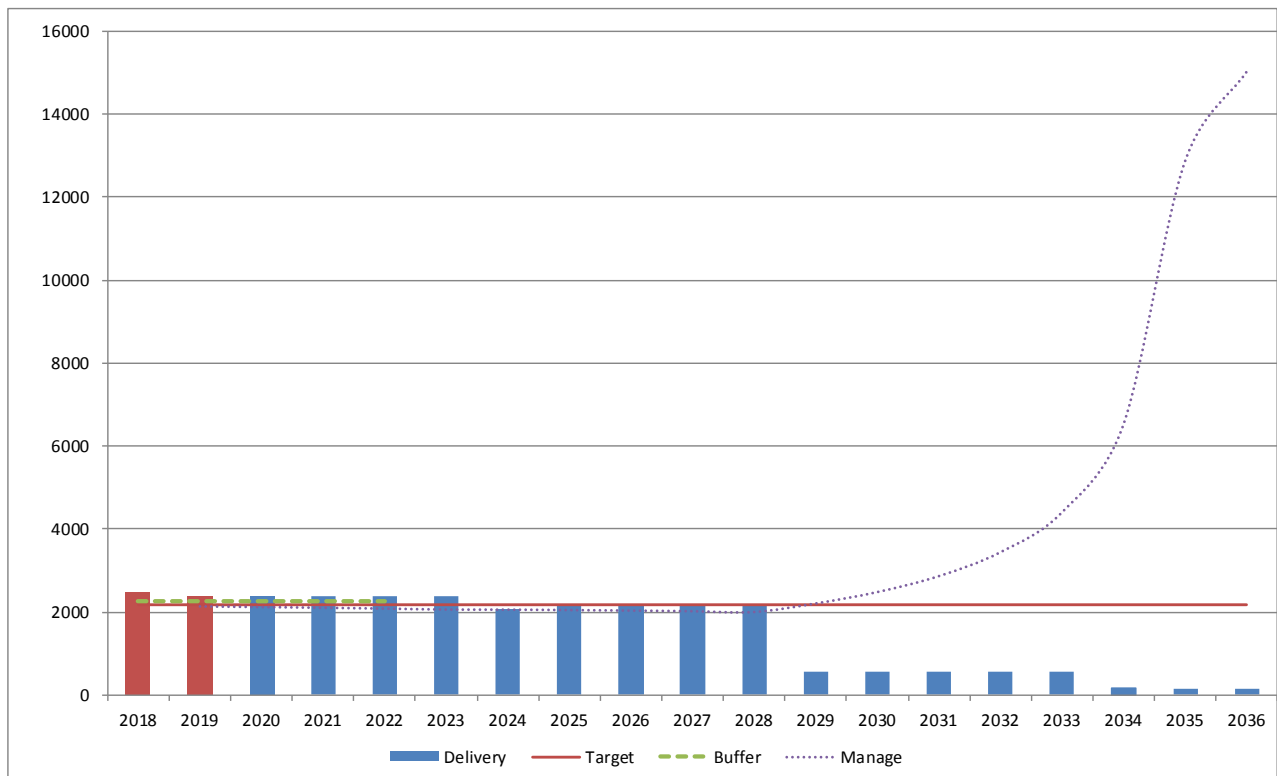
The new housing trajectory covering the period 2018 to 2036 is shown below. This shows that although delivery in the front end of the plan period is good, as the level of certainty surrounding key sites decreases in the latter part of the plan period the delivery levels fall. The Legacy Corporation is also utilising this target for the latter part of the plan period however post 2028/2029 the housing targets will have been reviewed through a future Local Plan Review by the Legacy Corporation or the relevant Local Planning Authority to take account of the relevant housing capacity and needs evidence at that time. By continuing the housing target beyond 2028/2029 the Legacy Corporation is committing to maximising housing delivery but is also mindful that proposed changes to the draft New London Plan at paragraph 4.1.8A indicate that should a target be required beyond 2019/20 to 2028/29, account can be taken of information within the SHLAA and the small sites assumptions, in consultation with the GLA.

As set out above a number of key assumptions have been made within the Housing Trajectory:

- Monitoring against the 2161 per annum housing target from 2018
- Inclusion of deliverable sites which have a reasonable prospect of that housing will be delivered on the site within the first five years of the plan period (2020-2024)
- Inclusion of a small sites assumption from year 6 onwards (2025)
- Grouped sub-area capacity figures from SHLAA year 6 onwards (2025)
- Additional site capacity included from Call for Sites within years 6 onwards (2025)

The NPPF requires that there is at least a 5% buffer of sites available in the rolling first five-year period to meet the annual target. The trajectory shows that delivery trends are likely to remain cumulatively above this 5% buffer up to 2026 so therefore is flexibility in supply up to this point. Following 2026 it is likely that new permissions will be able to fill the gap in the buffer at this point.

Figure 2 Housing Trajectory to 2036



As above the housing trajectory utilises the new London Plan housing targets from 2018 onwards. Table 2 below shows the impact of using the 2161 per annum target from 2018 and from 2020 as well as showing the cumulative delivery against the target factoring in under/over-provision over the period from 2014 to 2036. This shows that monitoring against the 2161 target from 2018 onwards shows a deficit in cumulative delivery in 2030 whereas monitoring against the 1471 current Local Plan target until 2021 when the Revised Local Plan will be adopted shows a deficit at 2031. In summary this shows that cumulative delivery trends are anticipated to remain above the cumulative targets until 2029 or 2030 and therefore the new Local Plan housing target will be monitored from 2018 onwards. The latter part of the plan period, post 2029/2030 will be subject to future Local Plan Reviews by the Legacy Corporation or the relevant Local Planning Authority to take account of the relevant housing capacity and needs evidence at that time.

5.3 FLEXIBILITY IN SUPPLY

The previous **Housing Background Paper (2014)** and **Housing Position Statement (2014)** highlighted that only the Legacy Communities Scheme and the Stratford City permission were considered ‘key’ to housing delivery within Legacy Corporation area. It highlighted that permissions within the area have often delivered

Table 2: Monitoring against targets

Year	Above/below cumulative with change at 2018	Above/below cumulative with change at 2020
2014	2411	2411
2015	2024	2024
2016	1269	1269
2017	551	551
2018	891	1581
2019	1117	2497
2020	1343	2723
2021	1568	2948
2022	1794	3174
2023	2020	3400
2024	1930	3310
2025	1920	3300
2026	1911	3291
2027	1901	3281
2028	1891	3271
2029	285	1665
2030	-1321	59
2031	-2927	-1547
2032	-4532	-3152
2033	-6138	-4758
2034	-8135	-6755
2035	-10133	-8753
2036	-12130	-10750

densities in excess to that which were considered within the 2013 Strategic Housing Land Availability Assessment, thus the topic papers were able to demonstrate a sufficient level of flexibility in the supply and a 11% buffer was identified at that point in time.

The Legacy Corporation also carried out a Call for Sites process as part of the consultation which took place in Autumn/Winter 2017. This process was kept open throughout the Regulation 18 stage and a number of new sites were identified. A series of engagement meetings also took place with landowners and developers to fully understand the submissions. The Sites Report, 2018 sets out how these sites, and other identified sites have been considered and the reasons for allocation or non-allocation within the Local Plan. This shows some additional capacity within the area to that considered within the SHLAA which has the potential to contribute towards meeting the Legacy Corporation's housing delivery target. The capacity likely to be yielded has been included and considered alongside SHLAA information below.

Changes set out within the new NPPF relating to viability with the aim of minimising the requirements at planning application stage mean that a number of sites were viability tested on the basis of minimum delivery assumptions with these minimum figures now incorporated within the site allocations text. These assumptions were based upon the 2017 SHLAA information for each site, unless a planning application has been determined for the site.

Key sites

The new housing targets contained within the draft new London Plan will be more challenging and as a result there will be less flexibility available in achieving this delivery than previously set out within the 2014 Housing Position Statement. However, with reference to new NPPF viability requirements in relation to 'strategic sites' only the Planning Delivery Zones which make up the Legacy Communities Scheme (LCS) and the Stratford City permissions are considered to be strategic-enough for their delivery to be considered as critical. These sites are considered strategic sites but do not require specific testing as they are both the subject of outline permissions which are at different stages of detailed delivery.

Legacy Communities Scheme (LCS) is an outline scheme delivering 6729 homes across 7 Planning Delivery Zones (PDZ) within the LLDC area. The first neighbourhood (Chobham Manor, PDZ4) has commenced and is partially completed and therefore there is considered minimal risk to delivery not being achieved as anticipated. The second neighbourhood to come forward at East Wick, PDZ5 has reserved matters permission for the first phase and is now under construction. Reserved matters approval will be sought for the remaining phases and delivered in accordance with the approved Zonal Masterplan. Therefore again this will be delivered in accordance with the outline permission. Sweetwater will be the next neighbourhood to come forward within the LCS scheme. The LCS is the Legacy Corporation's own scheme, with delivery partners in place for the zones described above. Therefore there is minimal risk that the housing within these PDZs will not come forward.

However a number of amendments have been made to the LCS to take account of the East Bank proposals (which comprise a new UCL East campus and the Stratford Waterfront scheme that will include a new site for the UAL London College of Fashion, museum space for the V&A, along with performance space for Saddlers Wells and a new home for BBC Music) replacing the LCS development proposed on Planning Delivery Zones 1 and 2. The East Bank proposals will result in a net loss of residential floorspace from the LCS. The outline permission for UCL East includes 1800 student bedspaces which amounts to approximately 600 conventional housing units on a 3:1 basis. The Stratford Waterfront application will seek permission for approximately 500-600 units. Given that the LCS would have delivered around 2,700 units on Planning Delivery Zones 1 and 2, this results in an approximate net loss of around 1400-1500 residential units. A Deed of Variation to the LCS S106 to reflect the UCL East permission made a commitment to make up as much as possible of the shortfall in housing delivery on Planning Delivery Zones 1 and 2 through increased density in Planning Delivery Zones 8 and 12. As the Legacy Corporation is the landowner for a large majority of the sites as well as the developers, there is a reasonable level of certainty that this anticipated housing development will be delivered. A proposed change to the Local Plan has been made to include a Case Study highlighting these priority projects for the LLDC area.

An insert for the Local Plan is proposed to provide further clarity on the Legacy Corporation's approach to its priority projects. This sets out how the Legacy Corporation and its partners will be focussing on the delivery of the East Bank project providing cultural and education institutions including Sadler's Wells, BBC Music and the V&A (in partnership with the Smithsonian Institute), as well as University College London and the London College of Fashion. The proposals also include residential delivery at East Bank (SA3.2) and student accommodation as part of the UCL scheme at SA3.3. With regard to housing delivery the priorities lie in delivering the planning permissions for approximately 2,400 new homes at Chobham Manor, East Wick and Sweetwater and delivering housing and achieving 50% affordable housing at across its portfolio of other sites which includes Rick Roberts Way (SA3.6), Bridgewater Road (SA3.5) and Pudding Mill (SA4.3). Utilising a portfolio-based approach presents the opportunity to maximise opportunities for economic growth and contribute towards the International Centre designation at Stratford whilst optimising housing and affordable housing delivery, compensating for any loss resulting from the East Bank proposals.

The Stratford City (SC) permission proposes a total of 6223 homes, of which 2818 were completed in 2014 and 333 in 2016/2017. There are currently 481 units under construction, leaving 2591 to be provided which includes 1224 homes at Zone 1 (Cherry Park) which is now subject to a new outline permission. The remaining 1367 homes will be provided across 4 remaining residential blocks, of which one is subject to reserved matters permission increasing capacity of the N06 plot by 102 units. There is strong certainty that the remaining blocks will come forward within anticipated timescales, however any proposed amendments to scheme would be required to meet or exceed anticipated housing delivery levels, therefore this strategic site is considered deliverable.

Strand East (SA4.3) has an outline permission for 1200 homes and a majority of plots also have reserved matters approval with some under construction. Therefore there is a strong certainty that this site will be delivered.

The Bromley-by-Bow (SA4.1) Masterplan SPD contained an indicative capacity figure of 1690 for the southern part of the site allocation which was included within the SHLAA. However subsequently two applications have been submitted and approved subject to S106 which deliver in total 898 units, which is 12% above the assumptions within the Masterplan for these parts of the site. If this trend is continued then it is anticipated that the site could deliver around 1900 units, or around 200 above previous assumptions. Therefore it is anticipated that delivery above SHLAA assumptions is still possible whilst maintaining the delivery of high quality developments.

The Hackney Wick Masterplan (SA1.1) outline scheme has been approved subject to S106, for 874 homes across the core part of the Neighbourhood Centre. A number of the masterplan plots also have a separate full permission with one, accounting for 150 units currently under construction. There are also extant permissions for a further 83 units, leaving a remaining capacity figure of around 641 units. Although in total non-delivery of this site would impact upon housing delivery within the area, it is likely that the plots will be brought forward by separate landowners/developers. As a result the risk to delivery is considered minimal.

The above shows that there is relative certainty regarding delivery of key sites within the area. Of the site allocations which are key to housing delivery within the area only two do not have any comprehensive form of permission or planning application in progress (SA1.2 and SA3.4).

As highlighted above the Stratford City permission covers a large part of SA3.1 but other plots have also been identified as having potential to yield residential capacity for up to around 1,000 homes over the plan period. These additional plots have also been promoted by landowners for residential delivery (see Sites Report, 2018). Although non-delivery of this capacity could impact upon overall housing delivery targets over the plan period, none of the sites fall within the first five years of the plan period and due to the complex nature of some of the other sites the delivery falls in the latter part of the plan period. Therefore delivery of this capacity is considered less critical.

The other site where delivery be a matter of strategic importance for achieving housing targets is SA3.4 (Greater

Carpenters District). This area corresponds directly to the designated Neighbourhood Area for the Greater Carpenters Neighbourhood Forum and relates to an area wider than just the Carpenters Estate. Utilising information from 2017 London SHLAA it is anticipated that the site has potential to deliver upwards of 2,300 homes and the site allocation text has been amended to confirm this as the appropriate minimum level of housing delivery given its location adjacent to the town centre and within PTAL level 6a-6b. Indeed the most recent London Borough of Newham information suggests a capacity of up to 3,000 homes for core areas of the Carpenters Estate alone. Therefore it is the Legacy Corporation's view that non-delivery of the core areas of this site or failure to deliver at appropriate densities to deliver this amount of housing could be critical to the planned delivery of housing. Changes have been proposed in this respect in particular to confirm the role of optimising housing delivery and related to this that tall buildings be directed to locations within the town centre boundary, meaning the area to the north of the allocation, adjacent to the station. Site allocation SA3.4 is also already bringing forward housing completions on smaller plots within the site (13/00404/FUM and 15/00598/FUL for a total of around 1,000 student bedspaces) and this trend is likely to continue.

The new NPPF requires that LPA's set out a housing figure for designated Neighbourhood Areas where a Neighbourhood Plan is being proposed for an area that has potential to deliver new housing. Coupled with the above changes it is now considered appropriate to set out a target for the Greater Carpenters Neighbourhood Forum to ensure the delivery of strategically important housing. As there are approximately 700 existing vacant and occupied properties within the Carpenters Estate this would be expressed as a net figure that assumed refurbishment or replacement of some or all of the existing housing on the estate. A housing requirement figure for the site allocation of 2,300 would therefore imply the capacity for an additional 1,500 homes across the site allocation area. The site allocation takes into account the opportunities for this site which include potential for locations currently not in residential use being able to provide capacity through mixed use redevelopment, the parts of the site being located in the town centre boundary being able to deliver at forms densities appropriate to this location as well as the potential for individual parts of the site to increase capacity through incremental development. This has the potential to ensure that a number of existing Local Plan principles are directly applied, namely optimising and increasing residential capacity of the site and that densities reflect the public transport accessibility. Given the increased emphasis on housing delivery within London as a whole and the 47% increase in the Legacy Corporation housing target as now set out within SP.2 the role of the site allocation at the Greater Carpenters District becomes more vital. A change has also been proposed to the site allocation to confirm the role of neighbourhood plans and community engagement requirements in light of best practice examples of the Mayor.

Non-strategic sites

Outside the site allocations discussed above, of all sites expected to yield some capacity over the plan period only approximately 3,500 units, or 6% of all delivery do not have some form of permission, or planning application at time of writing (Autumn 2018). Given that there is a total 5% buffer available up to 2026 as highlighted above, even in combination, non-delivery of these sites would be largely compensated for through this buffer.

As also highlighted above the 80 per annum small site assumption has only been included from year 6 onwards to allow for a change in policy approach to bed in. In total this accounts for only 1420 over the whole of the plan period (800 over the ten-year period). This in total accounts for only 3% of all anticipated housing delivery. Therefore provided that delivery continues to come forward within the site allocations as anticipated alongside some additional capacity there remains some flexibility in relation to delivery trends from small sites (discussed in more detail in section 6.3 below).

Measures

The housing trajectory shows that delivery within the first 5 years of the plan period is anticipated to be met, however close monitoring will take place should delivery fall behind these anticipated levels.

As highlighted above the small sites assumption has only been factored into the trajectory for years 6-10 when it is anticipated that the policy measures to increase capacity from such sites will bed in (see Section 6.3 below) however should monitoring demonstrate that delivery is below capacity then additional policy measures or a review of the relevant policies may be considered. This may include utilising information from the Characterisation Study to develop more specific design codes. This is referenced within the proposed changes to the Local Plan at para 5.4.

In the latter part of the plan period where delivery could fall below target, the Legacy Corporation, or the four Boroughs, as successor local planning authorities, will need to work to increase delivery which may include utilising detailed site survey analysis to determine potential sources of additional capacity; deliver housing under the duty to co-operate; and/or review housing targets applicable to the area related to housing capacity and need.

Flexibility considerations:

- **Current over-provision in terms of delivery from 2014 onwards, therefore a 5% buffer is appropriate**
- **It is possible to meet that 5% buffer as demonstrated within the Housing Trajectory well into the plan period**
- **However, other sites are proving to be more critical to achieving delivery of the target therefore guidance is provided within the site allocation as to their optimum level of delivery**
- **Measures have been identified should delivery fall behind schedule**

5.4 SMALL AND MEDIUM-SIZED SITES

In accordance with the NPPF local planning authorities are required to identify through the Development Plan process and the Brownfield Register land to accommodate at least 10% of the housing requirement on sites of no larger than a hectare. For the Legacy Corporation area this amounts to around 216 dwellings per annum. Appendix 2 to this paper shows the sources of housing capacity over the plan period by site allocations, permissions including outlines and additional capacity. In combination as shown in Table 3 below, around 18% of all housing capacity comes from sites of less than one hectare.

Table 3 Historical housing capacity from smaller sites

Site type	Small sites (<1 ha)	% of total
Allocations	752	1%
Permissions	2044	13%
Additional capacity	2036	41%
TOTAL	4831	18%

The NPPF also sets out how local planning authorities should utilise tools such as design assessments and Local Development Orders to help bring forward small and medium-sized sites and bring forward windfall sites. The new London Plan also anticipates a step change in delivery from small sites and conversions, and an element of the annual target for each local planning authority makes an assumption on the rate of delivery. Policy H.1 contains a number of considerations in relation to how this step change can take place, directing local planning authorities in their approach to achieving intensification of development and increased delivery within their Local Plans in particular circumstances. The Local Plan has been amended to take account of these changes through amending Policy H.1. The changes proposed to this policy highlight that the Legacy Corporation will promote small sites delivery by utilising tools such as the Characterisation Study, the Brownfield Register and PTAL mapping to identify potential locations that could yield additional housing capacity through small sites. An extract from the **Characterisation Study (2018)** is included in Appendix 4 which highlights broad locations which can potentially yield residential capacity from small sites, defined as less than 0.25ha or through residential conversions. As also highlighted within the policy, other locations within PTAL levels 3 to 6 are also considered broad locations of search. A PTAL map is also reproduced at Appendix 4 which shows that the highest levels of accessibility are focussed around Stratford and generally levels 3 and above cover Hackney Wick and a majority of Sub Area 2. Queen Elizabeth Olympic Park and Fish Island generally have PTAL levels falling below 3. Annual monitoring will be utilised to determine the extent of delivery from these sources and as demonstrated in paragraph 5.18, measures will be introduced such as more detailed housing capacity work or design codes, where required.

The **Characterisation Study (2018)** describes the current context of the area and identifies which areas are more likely to yield some housing capacity from small sites and conversions. As highlighted above the study can be utilised to determine where capacity from small sites and conversions may be brought forward. However should cumulative delivery rates fall behind the anticipated 80 per annum highlighted within the SHLAA within years 6-10 then the Legacy Corporation or other future Local Planning Authority may need to consider additional policy measures or review relevant policies which may include the use of prescriptive design codes. The supporting text to the Policy H.1 has been amended to reflect this at paragraph 5.16 and 5.18.

Although recent delivery rates have shown that 70 new homes overall have been achieved through small sites and conversions within the period between 2014 and 2017, 24 are from what would be considered small sites and 46 from conversions from other uses to residential. This amounts to around 18 per annum which is 62 below the small sites target introduced within the new London Plan. Therefore if delivery from these sources is to be increased then the policies of the Local Plan and the London Plan will provide a context for intensified development.

Changes proposed to Policy H.1 state that the Legacy Corporation will utilise the Characterisation Study, PTAL mapping and the brownfield register to identify areas with potential to yield small sites capacity. This information is shown within Appendix 4 of this Background Paper which will also be kept up to date within the Authority Monitoring Report. Changes have also been introduced to set out the considerations for where delivery is proposed within small sites and conversions at paragraphs 5.16 to 5.18.

PTAL levels within the Legacy Corporation area vary widely with part of Stratford achieving the highest 6b level whilst other southern parts with only levels 2 or 3. Therefore it is anticipated that Stratford and Sub Areas 2 and 3 are likely to achieve some of the higher residential densities of the area which can also translate, where appropriate to higher densities within small sites. Appendix 4 of this paper highlights some of the parts of the area with the highest PTAL levels which can potentially achieve higher densities.

Other changes introduced also set out the circumstances where proposals on small sites and conversions will be supported. This includes where the site is well-designed to optimise housing delivery; the proposal is in accordance with all relevant policies of the Local Plan, including those that refer to the loss/re-provision of open space, social infrastructure and employment floorspace capacity; and there is no unacceptable loss of amenity. It is understood that the emphasis on small site delivery across London may have some unintended implications for the delivery of self/custom-build through a greater competition for sites. The response may also be that such proposals would need to become more innovative to optimise delivery. The considerations for this are set out within the new proposed Policy H.8, and Policy SP.2 supports this form of delivery where other Local Plan policies are met.

The Legacy Corporation carried out a Call for Sites process during the consultation from the Local Plan Review, commencing in October 2017 and this remained open until the end of June 2018. A number of sites were proposed through this at a minimum threshold of 0.25ha. In an effort to bring forward more smaller sites, this has now been amended to include any site with potential to deliver in excess of 5 homes as identified within the guidance. The Legacy Corporation will periodically review its [Brownfield Register](#) to take account of any new sites identified through this process.

5.5 MAXIMISING AFFORDABLE HOUSING

Affordable housing requirements

In Summer 2017 the Mayor published his Affordable Housing and Viability SPG which has a number of implications on the approach to affordable housing in both the new London Plan and also the Local Plan. Most crucially it sets an overall target for 35% affordable housing across London and for 50% on publicly owned land. This has now subsequently been included within the new London Plan, where 50% is the threshold figure on public sector land, or industrial land where there is a loss of industrial floorspace capacity. In relation to the Local Plan amendments have thus been made to SP.2 and H.2 to take account of these changes as set out within Table A.1 and key matters below.

The adopted Local Plan included a target figure of 455 affordable housing units per annum based on the 1471pa target minus the proportion of non-self-contained units and proportioned to the 35% target. SP.2 has been updated to reflect the new 2161pa housing target however in relation to affordable housing targets the 35% figure is referenced instead of utilising a finite figure as previously. This is in line with the London Plan as this now requires 35% affordable provision from non-self-contained products such as student accommodation (H17, H18) policies and sets out that provision should be measured on a habitable room basis. This has now been made explicit within Policy H.2.

The Local Plan [Affordable Housing Viability Testing \(2018\)](#) has tested affordable housing on ten different site typologies on the basis of 60/40; 50/50 and 30/70 low cost rented/Intermediate (London Living Rent and London Shared Ownership) splits. These splits were selected on the basis of continuing the existing tenure split, which

has been identified as marginal for many schemes and the lowest position of schemes that could meet the AHV SPG tenure split of 30% low cost rented, with a central position. The testing found that the most challenging typologies were the densest schemes including tall buildings and the most viable typologies are lower scale developments on former industrial/warehouse or storage and open storage. It found that some schemes can achieve around 35% with some in excess of this dependent on typology but on average 25-35% can be achieved in the majority of cases. Therefore the 35% threshold requirement appears to remain relevant for the Legacy Corporation area.

Tenure mix

A need for affordable housing has been identified utilising the standardised approach to need assessments then policies should specify the type of affordable housing required with reference to Annex 2 of the document. This sets out 4 separate categories of affordable housing: affordable housing for rent, starter homes, discounted market sales and other low cost routes to home ownership. Within London however this has been more closely defined where the Mayor’s Housing Strategy and the new London Plan set out the Mayor’s three preferred affordable housing tenures (see below). London Affordable Rent is the preferred affordable housing for rent product and London Living Rent (LLR) and London Shared Ownership (LSO) are the intermediate products promoted. Therefore, these will be the tenures that the Local Plan will seek to be delivered within the area.

London Affordable Rent is rent for households on low income with the rent level based on social rent levels. These homes will be allocated in accordance with need (based on the borough’s allocations policy). This is set out within the Affordable Homes Programme 2016-2021) based on an annual London-wide benchmark for weekly rents as set out in the table below:

Table 4 London Affordable Rent benchmarks

Size	2017-18 Benchmark (£'s)
Bedset/1 bed	144.26
2 bed	152.73
3 bed	161.22
4 bed	169.70
5 bed	178.18
6 bed plus	186.66

London Living Rent (LLR) offers Londoners on average incomes a lower rent, enabling them to save for a deposit. The Mayor is introducing LLR as an intermediate affordable housing product with low rents that vary by ward across London. Where funded by the Greater London Authority, LLR will be a Rent to Buy product, with sub-market rents on time-limited tenancies and is seen as a step to home ownership. London Living Rent should be affordable to households on incomes of up to £60,000. Of the four main wards covering the LLDC area the current LLR monthly rent levels are as shown in the following table:

Table 5 London Living Rents by wards

	Hackney Wick	Stratford and New Town	Bow East	Bromley North
One bedroom	£767	£806	£879	£786
2 bed	£852	£896	£976	£874
3 bed	£938	£985	£1,074	£961
4 bed	£1,023	£1,075	£1,172	£1,048
5 bed	£1,108	£1,165	£1,269	£1,136
6 bed plus	£1,193	£1,254	£1,367	£1,223

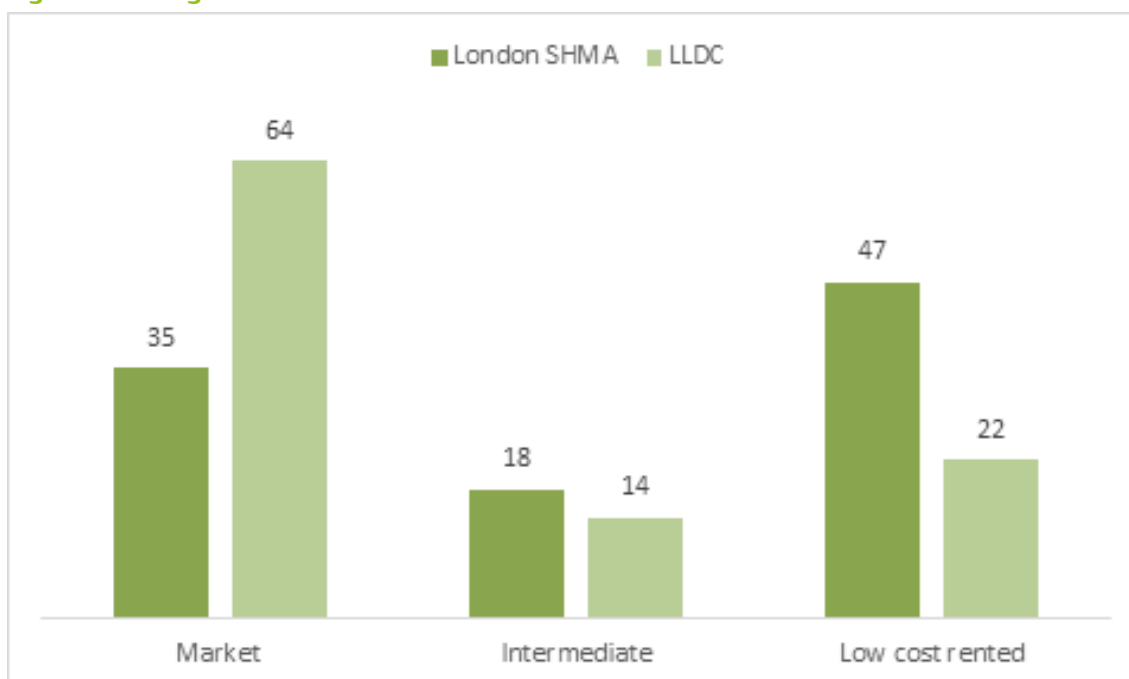
London Shared Ownership is an intermediate ownership product which allows London households who would struggle to buy on the open market, to purchase a share in a new home and pay a low rent on the remaining, unsold, share.

Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. Intermediate ownership products such as London Living Rent, London Shared Ownership and Discounted Market Sale, should be affordable to households on incomes of up to £90,000. The caps will be reviewed and updated where necessary in the London Plan Annual Monitoring Report.

The new London Plan and the SPG set out that to utilise the fast track route schemes must conform to the following tenure mix of 30% social/affordable rented; 30% intermediate; and 40% to be locally determined by the local planning authority in the Development Plan. Evidence from the [Housing Requirements Study \(2018\)](#) highlights a greater need for low cost rented products within the Legacy Corporation area, with a 61/39 (low cost rented/intermediate) local need. As only one third of housing delivery within the LLDC area technically meets local need, it is also relevant to take into account the wider London strategic need which generates a 67/33 split in favour of low cost rented products. However, although the new London Plan’s approach within H7 emphasises this need for low cost rented products it does recognise that *“for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community”*. The results of the viability testing suggests that viability is challenging for a number of typologies at a 60/40 split therefore any increase in proportion in favour of low cost rented could impact significantly on the viability of a scheme. Therefore, in the interests of balance, meeting both local and wider needs, it is considered that it is appropriate to continue with a 60/40 tenure mix split within the area.

Proposed amendments to Policy SP.2 and Policy H.2 will bring policies into line with the Mayor’s new affordable housing threshold approach, set out within the [Affordable Housing and Viability SPG \(2017\)](#) and the new London Plan. This will enable schemes achieving the relevant threshold of 35%, or 50% on public land or industrial land where there is a loss of industrial floorspace capacity, and the relevant tenure split to go through what is termed the Fast Track Route. Schemes below this will need to go through the Viability Tested Route and submit full a Viability Appraisal justifying the proposed level and tenure of affordable housing. Policy SP.2 of the Local Plan has also been updated to reflect the Mayor’s threshold approach to affordable housing on a habitable room

Figure 3 Strategic and local needs



basis but no changes have been made to the tenure mix requirements within Policy H.2 or to the percentage requirement itself. The only change in relation to this is that the approach has been installed directly within the strategic Policy SP.2. Policy H.2 now specifically mentions the Mayor’s threshold approach to viability and the references to the affordable housing tenure split have been amended to clarify how the London Plan’s 30% low cost rented/30% intermediate/40% borough determined requirement and how this will be applied has been incorporated within changes to the policy.

Rather than being included as a separate policy as previously, Build to Rent has now been included within Policy H.1 and amendments have also been made to SP.2 and Policy H.2 to highlight the specific affordable housing requirements. The tenure mix requirement for Build to Rent is highlighted in paragraph 5.15 which sets out that the affordable provision should consist entirely of discounted market rent with 60 per cent offered at equivalent rates to London Affordable Rent, 30 per cent equivalent to London Living Rent and 10 per cent being equivalent to other intermediate housing products. This has been determined by the needs information from the [Housing Requirements Study \(2018\)](#) and is considered broadly equivalent to what would be required for other housing schemes where market sale is the dominant tenure. In the interests of mixed and inclusive communities it is considered that the 10% flexible intermediate would be Discounted Market Rent and would be appropriate to facilitate a balanced mix across a scheme.

Therefore, taking into account the [Affordable Housing and Viability SPG](#) and the Local Plan policies it is expected that schemes should be providing 35% affordable housing at a 60/40 split to go through the Fast Track Route. Where schemes are accepted below this mix threshold this would only be where it was possible for that mix to be justified by the circumstances of the scheme, the achievement of other policy objectives and a clear viability case having been made. The case would also need to be sufficient for the Mayor of London, for those schemes that are referable to the Mayor, to be content with the mix to be provided.

In respect of its own sites the Legacy Corporation will seek to adopt the Mayoral affordable housing threshold approach, delivering 50% affordable housing across the portfolio of its sites that remain undeveloped and do not have a delivery partner appointed to deliver the consented Legacy Communities Scheme outline permission. This approach may mean that tenure split and housing typology mix could vary to reflect the location and specific circumstances of each site. This approach is set out within proposed changes to Section 3 of the Local Plan.

The most recent permissions data within the [2017 Authority Monitoring Report](#) identifies a total of 20% affordable housing on applicable schemes with a 46/53 social or affordable rented/intermediate mix. Although this is below the 35% target the impacts of the Affordable Housing and Viability SPG are already being felt with a number of schemes achieving 35% affordable housing. It is anticipated that this will be reflected in future AMRs. For example, a number of schemes recently given a resolution to grant at Committee have achieved 35% as set out within Table 6 below.

For confirmation, the NPPF also states that for major developments 10% of homes should be available for affordable home ownership products except where this would exceed the amount of affordable housing required. The above sets out that the affordable housing target for the area is 35% and 60/40 split. This means that

Table 6 Schemes achieving 35% affordable housing

Application no.	Detail
16/00451/OUT, Wickside	Mixed use development including 475 homes including 35% affordable housing on site with a 35% affordable rent and 65% intermediate tenure split, secured through S106 to a range of household income levels.
17/00225/FUL 25 Trego Road	Mixed use development including 52 residential units with 35% affordable housing. On a habitable room basis, the tenure mix constitutes London Affordable Rent (31%); London Living Rent (38%); and Shared Ownership (31%).

intermediate affordable housing accounts for 14% of eligible housing schemes which should include home ownership schemes. Exceptions to this requirement are made in the NPPF for exclusively Build to Rent schemes, specialist accommodation including that for the elderly and students, self-or custom-build and where site is exclusively for affordable housing. Some proposed amendments to policy H.2 are also made to clarify that when determining the detailed affordable housing tenure mix the intermediate product should contain an equivalent of 10% low cost home ownership, including a reference to the exclusions.

Figures 4 and 5 below show the proportion of different tenures at 35% and 50% affordable housing based on the tenure split requirements set out within the Revised Local Plan.

Figure 4 35% affordable housing

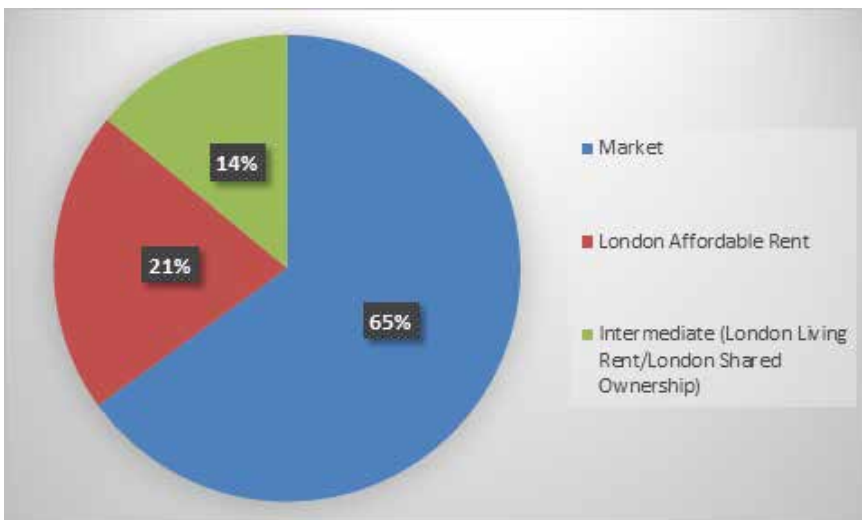
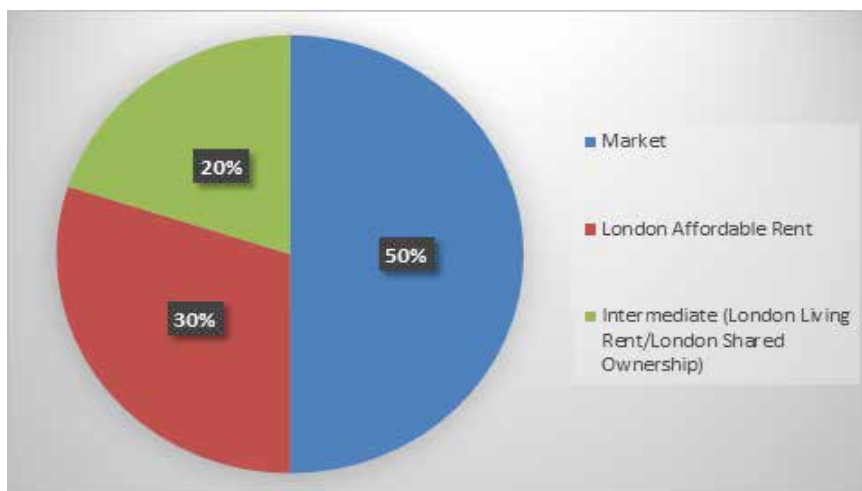


Figure 5 50% affordable housing



Affordable housing from small sites

The NPPF at paragraph 63 states that affordable housing contributions should not be sought from non-major developments. The definition of major at 10 dwellings means that this applies to sites below this number.

However, within London under some circumstances where evidence supports this contributions towards affordable housing in the form of off-site contribution may be supported. As highlighted previously in relation to small sites delivery it was found that a majority (66%) of the past small site/conversions capacity has come from conversions from other uses to residential through Permitted Development rather than on small sites. Therefore these schemes would not be captured for affordable housing requirements even at a lower threshold. Over the 2014-2017 period only 24 new units were built on small sites from three schemes, of which one was over the 10 unit threshold so delivered affordable housing, leaving 12 units over 4 years, or 3 per annum. Therefore even if this is increased proportionally to the 80 per annum anticipated over the mid to late Plan period this would only amount to approximately 13 new builds from small sites per annum. Based on this, a small sites policy approach to affordable housing would be unlikely to be able to yield a significant increase in supply. Conversely, schemes on small sites yielding a greater number would in any case be required to provide affordable housing in accordance with the policy.

5.6 HOUSING CHOICE AND DIVERSITY

Housing size and mix

Paragraph 61 of the NPPF requires that policies should identify and reflect the size, type and tenure of homes required for different groups including that of older persons, students and travellers Therefore Local Plan policies must deliver a wide choice in housing provision through a housing mix based upon housing trends and requirements.

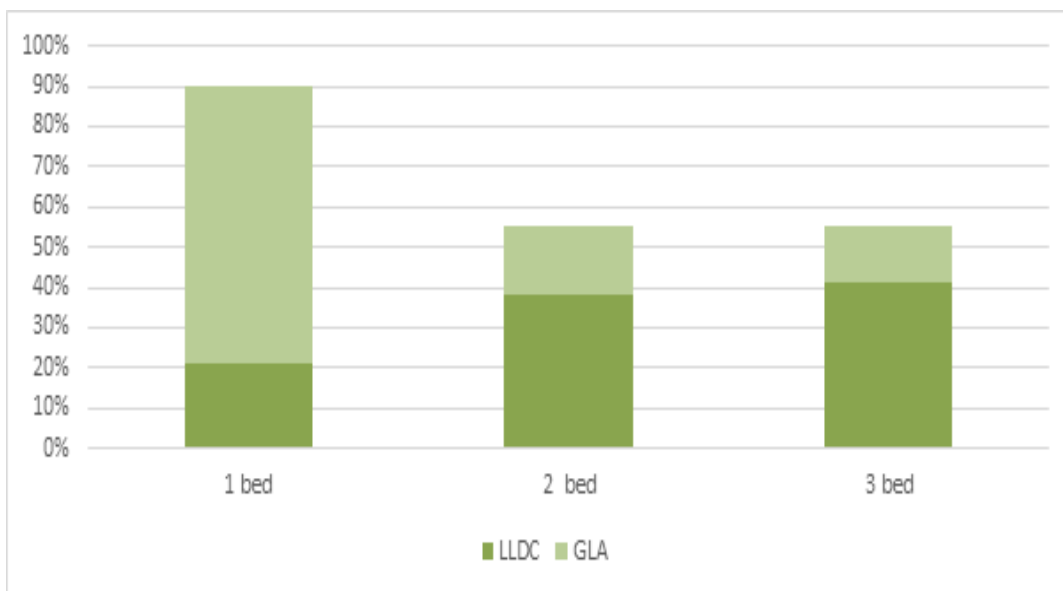
Policy H12 of the new London Plan sets out that the Mayor does not expect prescriptive housing size and mix policies to be set apart for low cost rented products. The approach set out within the adopted Local Plan is considered sufficiently flexible to meet both the NPPF and London Plan requirements where a 'balanced mix' of one, two and three-bedroom properties is supported, with over half having more than two bedrooms. Amendments to policy H.1 have been made to provide a further level of prescription for low cost rented accommodation with these tenures providing an 'equal' mix of one, two and three-bedroom properties. The local evidence for housing mix and requirements is contained within the Housing Requirements Study, however as highlighted above as over two-thirds of the housing delivery within the area is to provide for strategic housing requirements. The 2017 London SHMA is also of particular relevance. This highlights a particular demand for two-bedroom market homes and, within the affordable sector, for two and three bedroom homes within the Legacy Corporation area and a greater strategic need for low cost rented properties, in particular for one-bedroom properties across London.

Figure 4 below sets out the specific size requirements from the HRS and the London SHMA, reinforcing why the 'balanced mix' approach has been retained within the Local Plan. Figure 4 below also shows local and strategic need for low cost rented products, showing a marginally higher need for 1 bedroom at 45% and this reflects the greater demand for this size across London. The HRS also reviewed the latest Strategic Housing Market Assessments of the Boroughs identifying the greatest need for 3 bedroom affordable homes in Newham and Hackney, and the greatest need for three bedroom plus homes within the low cost rented sector. Therefore given that the Legacy Corporation area is also providing for the needs of the Growth boroughs it seems appropriate that this need for two and three bedrooms be taken account of in the dwelling mix and the 'equal mix' of one, two and three bedroom homes is taken forward within the Local Plan.

Figure 6 Local and Strategic size requirements



Figure 7 Low Cost rented size requirements



In relation to housing mix more generally, the [2017 AMR](#) identifies that provision of different dwelling sizes has been relatively evenly balanced over the three-year period from 2015-2017 with an average 37/35/28 split between 1, 2 and 3 beds which is in line with the current Local Plan policy requirement for a ‘balanced mix’. Latest evidence on local and strategic housing requirements also supports maintaining this policy approach in the Local Plan Review.

As well as the specific Housing Mix policy (H.1) the adopted Local Plan (2015) included a number of housing policies for non-conventional or specialist accommodation, including older persons accommodation, student housing and gypsy and traveller accommodation. It also included policies specific to HMO and Private Rented Sector (PRS) accommodation. These policies are considered to add to the housing choice and mix of the area. However, since this time a number of new forms of housing have begun to emerge, both within and outside the Legacy Corporation area. There has also been an increase in emphasis and delivery on Built To Rent (BTR) accommodation (formally referred to as PRS) which has thus been included within the Local Plan as a ‘conventional’ housing product, but with clear guidance on delivery and viability. This includes bringing forward elements of Policy H.7 into Policy H.1 and is discussed in detail above.

Other non-conventional forms of housing

Non-conventional forms of residential accommodation are, and are likely to play an increasingly significant role in contributing to the housing supply and mix of the area. The London Plan makes clear distinctions between products and monitoring of supply in relation to the extent to which non-conventional accommodation meets strategic housing needs as well as the potential to relieve pressure on the standard housing supply. The conclusions in relation to older persons accommodation is that it can potentially free up under-occupied larger dwellings so older persons accommodation can be monitored on a 1:1 basis, however student and other non-self-contained accommodation will contribute to the strategic supply but as students and other occupants are likely to younger and sharing private sector rented homes then provision will only free up supply on a 1:3 basis. The change to monitoring has been referenced within the Local Plan changes, but the implications of this could be felt more widely in relation to preferred products. Monitoring will take place on the following basis, where the list is not definitive:

Table 7 Monitoring ratios

Type	Ratio
Older person's accommodation	1:1
Student housing	3:1
Shared living	3:1
Supported accommodation, hostels and specialist accommodation	3:1
Accommodation for households with shared characteristics	3:1

The GLA has conducted some very detailed housing density work looking at the varied approaches to, and implications of higher density living. Non-self-contained accommodation within shared living or student housing, even at a 1:3 basis is likely to have smaller units and therefore greater population densities. Table 8 below shows an example of how the density could differ by type of scheme, showing that the same 17 units (equivalent to 50 shared living bedspaces) could yield very different resident populations. Shared living is discussed in detail within section 8.6 below. Managed non-conventional forms of residential are less likely to be under-occupied so the level of certainty over number of occupants is also greater. It is also likely that the resident populations are younger than other conventional forms of residential, therefore could have different infrastructure demands than conventional housing. Therefore the supporting text to policies H.4, H.7 and H.8 at paragraphs 5.32, 5.44 and 5.51 sets out that the Legacy Corporation expects information to be provided by the applicant to enable a comparison to be made in population density terms against conventional housing schemes meeting all Local Plan objectives. This will enable any impacts on infrastructure provision to be mitigated through the design and content of the scheme or through off-site provision/contributions secure through planning obligations, if relevant. Similarly older persons accommodation would be monitored on a 1:1 basis, however densities are also much lower when the communal and supported space is accounted for.

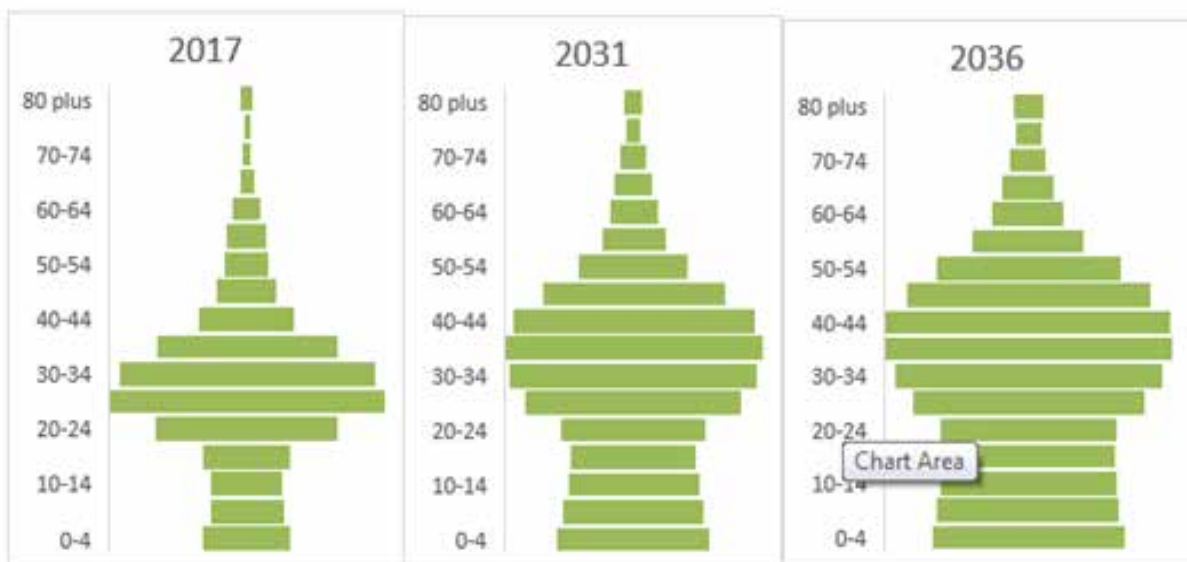
Table 8 Population occupancies worked example

Shared living	Conventional housing	Older persons extra care housing
17 units = 50 bedspaces 50 occupants 750 sqm plus approx. 50sqm communal living space	17 units = 17-66 bedspaces 17-66 occupants 960-1200sqm	17 units= 17-34 bedspaces 17-34 occupants 835-1015sqm plus communal space as appropriate
1 person per 16 sqm	1 person per 18-56sqm	1 person per 49-59sqm

Older Persons Accommodation [Policy H.3]

There are two sites of dedicated older person's accommodation within the Legacy Corporation area providing just under 100 extra care units. Both are dedicated, modern accommodation and therefore it is unlikely that any proposal to change use from this accommodation on an argument of standards would be permitted. This is comparatively low level of provision reflected in the results of the household survey which identified that only around 4% of households currently contain older persons (over 65s), however this proportion is highest within Sub Area 1 where around 18% of the population are over 65 where there are some dedicated older persons housing. Although the population forecasts project that the proportion of these households are set to increase over the plan period to 5% in 2036, the proportion still remains below London and UK averages (London 12%, UK 18%). The [Population Report \(2018\)](#) sets out the methodology of the study and the older person projections are based on the assumption that the proportion will remain constant. However by 2036 the dwelling stock will have increased to approximately 38,000 homes and will also have been built to much higher accessibility standards than the older stock (see BN.5) therefore this is likely to enable a greater proportion of households to stay within their own homes. Therefore it is not anticipated that any major change in policy emphasis is required within the Local Plan Review.

Figure 8 Population profiles to 2036



Changes to this policy are relatively minor and are mainly to reinforce the approach of the London Plan including a need to provide affordable older persons C3 accommodation. The Legacy Corporation does not have a specific older persons' benchmark figure from the London Plan. However, the Housing Requirements Study identifies a need, constrained to the London Plan of 161 older persons accommodation in the period to 2036, with 77 of these to be Leasehold Schemes for the Elderly (LSE). Given the small proportion of this requirement related to the overall housing target of 2161 per annum (0.4%) this will be provided through application of Policy H.3 rather than requirements on specific sites. Policy H.3 sets out how proposals for older persons accommodation should be provided. Some proposed changes have been made in relation to clarifying the distinctions between C2 and C3 to assist in clarification of requirements for proposals. A number of changes are proposed to clarify the requirements where changes of use from older persons accommodation, or between products are proposed.

Student housing [Policy H.4]

The new housing target for the Legacy Corporation area within the new London Plan contains a contribution of 24 homes per annum from non-self-contained forms of accommodation including student housing. It also sets out that student accommodation will now be monitored on a 3:1 basis which equates to 72 rooms per annum within the target. At the time of writing, 956 student bedspaces are under construction in the LLDC area. In terms of delivery within the LLDC area, permission has been granted for 4566 student bedspaces. For the purposes of clarification, schemes permitted prior to the consultation on the draft new London Plan in December 2017 have been counted on a 1:1 basis, whereas schemes coming forward post this date will be monitored on a 3:1 basis. This amounts to an equivalent of 3366 new homes. This suggests that the LLDC area is contributing significantly to the aims of the London Plan in diversifying the location of such accommodation. It is anticipated that due to the accessibility of the location as a whole, and the new institutions coming to the area this will continue to be the case.

Table 9 Student schemes within the area

Scheme	Number of student bedspaces	Progress
Unite Stratford	1051	Complete
Unite Angel Lane	759	Complete
Alumno	445	Recently completed
Duncan House	511	Under construction
UCL East	1800	Permitted
Total	4566	

The new London Plan makes a number of amendments to how student accommodation should deal with affordable housing provision, setting out that 35% of rooms should be what is deemed affordable student rooms, meaning at rates affordable to students on maximum maintenance loan finance. Policy H.4 has been amended to reflect this at paragraph 5.31. This is a change from the previous approach within the Local Plan which ensured linkages were made with Higher Education Provider which would secure rates were comparable to accommodation provided by the Higher Education Provider itself. The Mayor also will publish applicable affordable rates on an annual basis. This change therefore makes a more direct link between student finance and accommodation rates.

As highlighted above since taking on the planning powers the area has seen significant growth in student accommodation, which has been concentrated within Sub Area 3. This recognises the high public transport accessibility levels but also the area where institutions are or will be located and therefore in accordance with the principles established within the adopted Local Plan and the new London Plan the Metropolitan Centre or the edge of centre is considered an appropriate location for student accommodation. Outside this, suitability of location with respect to easy access by walking, cycling or public transport to the Higher Education Providers to which the proposal is linked including using PTAL levels will continue to be factors, as will be the potential for any adverse impacts such as noise, disturbance or amenity impacts. Amendments have also been proposed to the student housing policy to acknowledge the greater certainty of the population student schemes will yield and to mitigate some of the potential impacts on demand for infrastructure through S106 contributions.

The **Housing SPG** promotes the potential use of student accommodation in vacation periods for ancillary uses. A number of consultation responses also supported this therefore amendments have been proposed allowing

the use of student accommodation for other ancillary uses within the vacation period. However to ensure that the main use remain predominately available for meeting student housing needs the policy proposes that this should be restricted to conference delegates, university interns, and short course students and at rates equivalent to that charged students during term time.

Planning for Gypsy and Travellers [Policy H.5]

Although the approach within the national planning guidance, [Planning Policy for Traveller Sites, 2015](#) has not changed radically since the 2012 version, the main change was the introduction of a new planning definition of gypsies and travellers removing those that have ceased to travel on a permanent basis from the definition. This change has caused widespread and significant concern within the gypsy and traveller community. This has been recognised by the Mayor in his new London Plan which adopts a wider definition similar to that previously contained within the national guidance. The Legacy Corporation is mindful that the tests of soundness are against the NPPF and the PPTS with 'general conformity' required to the London Plan. Therefore the Local Plan has to address the needs of the households which meet the national definition.

The PPTS requires 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.

Setting a pitch target

The [Housing Requirements Study \(2018\)](#) identified a need for 9 pitches up to 2036 to meet need based on the national definition of gypsy and travellers as set out within the Planning Policy for Traveller Sites document and a need for a further 15 pitches to meet the requirements of other households who culturally or by way of lifestyle have a need for pitch accommodation but whom no longer meet the definition. This approach is also recognised by the Mayor within the new London Plan whereby a wider definition is utilised (see Policy H16). The Legacy Corporation has committed to working with the relevant local authorities to deliver requirements in accordance with the duty to cooperate. This is also a topic within the [Duty to Cooperate Background Paper \(2018\)](#).

For clarification, the previous requirement within the Local Plan of between 10 and 19 units was based on evidence covering the period 2013-2028 and set out a five-year target of 2015-2019 whereas the latest study covers the period 2017 to 2036, and the first five years of the plan period will be 2020-2024. The 2014 study identified a current net need for pitches (at 2014) of between 1 and 7 pitches (dependent on scenario), whereas the current need at 2018 is identified as between 3 and 6 (dependent on definition). The need figure within the [Housing Requirements Study](#) captured the same households living within the one site within the area so also includes the backlog need from the previous study, therefore the need figure for 9 or 24 pitches dependent on the definition is considered to be appropriate for the plan period.

Table 7 below shows the need according to the two different definitions, with the need according to the national definition front-loaded. It shows that either way delivery of the Bartrip Street site within the first five years is essential to meet the needs identified for that period. The Bartrip Street allocation (SA1.9) has potential to provide around 9 pitches which meets the requirements under the national definition of 9 pitches required to 2036, or the first 5 years under the extended definition. Policy H.5 has been amended as set out within Table A.1 to update to pitch targets in accordance with latest evidence, setting out appropriate measures should delivery of the allocated site at Bartrip Street (SA1.9) fall behind schedule. Appendix 2 to this paper also provides detailed information on the progress towards the delivery of the Bartrip Street site.

Table 10 Gypsy and Traveller Accommodation Needs (HRS 2018)

	Total requirement	2020-2024	2025-2029	2030-2036
National definition	9	9	-	-
London Plan definition	24	9	8	7

The Bartrip Street site has the potential to meet the needs of the households meeting the national definition of gypsy and travellers, and the Legacy Corporation will work the London Borough of Hackney under the duty to cooperate to ensure that the needs of those households meeting the planning definition are given priority.

Site search process

The [Housing Background Paper \(2014\)](#) to the Adopted Local Plan set out detail in relation to the site search process. This was conducted in stages, the first discounting sites proposed for other uses within local plans or permissions, or covered by other designations; and the second looking at proximity to existing sites. This narrowed down the search area to around Hackney Wick and Fish Island and then four sites which were then assessed within the [Gypsy and Traveller Site Assessment \(2014\)](#) which then concluded that there were no available sites. However the Bartrip Street open space designation was separately reviewed within the Open Space Assessment concluding that it had little value so removal of this designation and confirmation of availability of the site by its owner removed the constraints to allocation. Therefore at this point in time the allocated site at Bartrip Street was the only site to fulfil all the relevant criteria. Since this process was carried out there have been no suitable sites have been made available, and in reality, site availability has become more constrained given that new permissions have been granted and schemes have been built out.

Furthermore no new sites were proposed through the Call for Sites process, however representations did call for greater flexibility in relation to the site allocations and other development sites within the area. Due to the pressure relating to housing delivery it is not considered possible to amend committed delivery within these sites to increase delivery of gypsy and traveller accommodation beyond current anticipated levels. However as previously acknowledged the Legacy Corporation continues to work under the duty to cooperate to bring forward commitments and plan for wider local housing requirements. Further detail is provided within Appendix 3 of meetings and other discussions.

Houses in Multiple Occupation [Policy H.6]

Policy H.6 of the adopted Local Plan focusses on houses of multiple occupation in the traditional sense of having at least 3 tenants living together to form one household, sharing washing and cooking facilities but let on a room by room basis, rather than as a single property. Large HMOs are defined as being over three storeys high with 5 tenants or more. In recent years new forms of residential accommodation have been emerging, with some similarities to HMO accommodation but also student housing. The supporting text to Policy H.6 has therefore been updated at paragraphs 5.37 and amended to ensure clear distinctions between this existing policy and the new Policy H.7, and in particular to reflect the new London Plan Policy H18. Another key difference is that HMO accommodation is expected to meet the identified housing space standards that apply to Use Class C3 housing. For clarification, schemes will only be determinable under policy H.6 and considered an HMO where there is no provision of communal facilities or services, other than shared washing or kitchen facilities. Good standards of provision of HMO would instead be applied.

In the context of the draft New London Plan and the Letwin Review of housing delivery it is important to provide the policy framework to allow a broad mix of housing types to come forward. HMOs can continue to play a role in this and amendments have been proposed with this respect.

Given the Mayor's emphasis on small site delivery there is a potential for pressure to sub-divide any larger residential stock in accordance with the new principles set out within the Local Plan's amended Policy H.1. Since its adoption no such proposals have come forward and no proposals for purpose-built HMO accommodation have come forward however reference has been removed (from paragraph 5.38) to the potential use of Article 4 Directions in this context.

Amendments to Policy H.6 are also proposed to clarify that HMOs will be monitored similarly to student and other non-self-contained accommodation on a 3:1 basis. Where the number of bedspaces is equal to 10 or more conventional residential units, the 35% off-site provision payment would be triggered, (i.e. generally equivalent to 30 or more non-self-contained units). This amendment has been made within the policy text (paragraph 5.37) and is in line with the new London Plan affordable housing policies. New HMO provision will be delivered to modern standards and are anticipated as having similar viability issues to C3 accommodation as well as shared living proposals. The 35% is the threshold at which proposals will be able to go through the Fast Track Route. Proposals which are unable to delivery 35% from schemes of 30 rooms or more have the option of submitting detailed viability information through the Viability Tested Route.

Shared Living [Policy H.7]

The distinctions between HMO and shared living accommodation are clearly set out within policies H.6 and the new H.7. The London Plan defines large scale shared living as containing at least 50 units and will only be considered as such where criteria as set out within Policy H18 are met, specifically: under single management with a clear management plan; having communal facilities and services; and is demonstrably not C3 accommodation. The Legacy Corporation has defined each of these different products through the corresponding policy, but has also chosen to more closely define shared living in relation to scale. In accordance with the London Plan large-scale shared living is defined as schemes containing 50 or more units, but the Local Plan also includes smaller schemes which will also be considered as shared living where all the other London Plan criteria are met. This is to provide the policy framework to determine smaller schemes which are clearly shared living by their nature and to capture medium-scale schemes which would also trigger affordable housing requirements. It is also considered that the nature of different products is changing and shared living could be a small part of a larger, mixed use scheme, or a small part of a wider residential offer. Therefore schemes under the 50 unit threshold are also likely to be proposed and under these circumstances the ability to determine under a shared living policy would still be required.

In relation to affordable housing, proposals providing an equivalent of 10 or more C3 units would be required to provide affordable housing in accordance with Policy H.2. For shared living proposals which will be monitored on a 3:1 basis this would be triggered at 30 bedspaces. The implications of not having a policy for smaller schemes are that there would be no clear guidance how these proposals should contribute towards affordable housing provision.

The [Combined Economy Study, 2018](#) highlights how the economy of the area is growing, with Stratford Metropolitan Centre providing a focus for growth in retail, cultural activities and office accommodation. The London Plan highlights the potential for International Centre designation (SD7) at Stratford and that these centres should be a focus for higher density residential. With this strategic direction new forms of residential accommodation with supporting facilities, as set out within the London Plan Policy H18, could contribute towards the diversity of the centre. New forms of such accommodation could also be appropriate within the new District Centre at Bromley-by-Bow to contribute to the vitality and viability of the centre. However, where proposed outside these locations it is important that conflicts with established communities are minimised by way of the delivery at an appropriate residential and population density and amenity and therefore these requirements have been included within the supporting text to the policy at paragraph 5.41.

Policy H18 of the London Plan sets out that proposals should demonstrate a market need for this form of accommodation and that proposals should contribute to mixed and inclusive neighbourhoods. Given the role and status of the Metropolitan Centre it is considered that proposals demonstrating that they meet a strategic need for such accommodation from across London will be sufficient. Where proposals are outside the Metropolitan Centre this need should be focused on meeting local need, and demonstrate why this need cannot be met within the Metropolitan Centre. This requirement is similar to that contained within the student accommodation policy, and given the similarities in provision and approach this is considered appropriate. Similarly where proposals for shared living are considered to impact negatively on mixed and inclusive communities at a neighbourhood level, additional information would be expected to be provided to demonstrate local need for the product and/or S106 contributions sought to make the development acceptable. This may be in the form of contributions towards improvements to public realm or wayfinding, particularly considering the areas where these forms of product are likely to be focussed, in particular around Stratford High Street or providing facilities accessible to the local community.

For the avoidance of doubt the Legacy Corporation considers schemes to fall within this category where they fulfil the categories set out within the new London Plan, in relation to being sui generis, management, tenancies, facilities and affordable housing. Where schemes do not fall within this category including accommodation where each unit has its own front door, is self-contained by way of having basic washing and cooking facilities within the unit they will generally be considered to fall within Use Class C3 and other relevant housing policies would apply.

The demand for shared living, as a relatively new housing product, has not been tested over the long term however given the extent of the demand for housing, particularly in London, it is felt that new housing products such as this are likely to play an increasing role. Alike other forms of residential affordable housing is required for shared living. The London Plan allows contributions towards off-site C3 provision and this approach has been taken forward within the Local Plan. The policy sets out clear requirements for proposed changes of use away from shared living including changes in quantum or configuration, setting out that a viability reappraisal would be sought. Detailed justification of the proposed residential to non-residential ratios and what is required for a successful product at the initial application stage should also help avoid an aspiration for subsequent changes to this ratio in favour of higher-value residential use.

Innovative Housing Products [Policy H.8]

Since the adoption of the Local Plan in 2015 a number of new housing products have emerged, hence the inclusion now of a new shared living policy. It is also envisaged that the current need for housing across London will result in the development of further new, and innovative housing models coming forward in the future. The inclusion of the new policy H.8 aims to ensure that the Local Plan remains up to date as much as is possible with this respect and provides policy to be applied to products which do not necessarily fall within any other of the policy areas. It sets out a number of requirements for proposals not falling within other specialist housing policies should meet, which in many cases reflects the requirements of other products with some similar characteristics. The principles of which are closely related to the requirements of other specialist housing policies (Policy H.3 to H.6, and new proposed H.7).

The policy sets out that all schemes should provide information on the need for that particular kind of accommodation. Alike shared living and student accommodation this is to ensure that the delivery of new innovative housing products are not over-represented and/or compromise the delivery of conventional housing. Where a scheme is proposing a product to meet a specific need from an identified group, occupancy conditions will be placed on any permission granted to ensure that the product continues to meet these specific needs in the future. Proposed changes to the Interim Uses Policy B.3 reflect the London Plan with regard to potential for housing as an interim use. Where this is proposed the development will be secured as such for the relevant time-period.

One of the principal aims of the London Plan, enshrined within the Local Plan, is the principle of ensuring mixed and inclusive communities. Alike other housing products, new proposals would need to demonstrate how they contribute to the overall housing supply and are meeting a genuine need for that form of accommodation. However it is also important that they contribute to the overall mix and balance of the community. In delivery of this it is also important that the delivery of housing in general is not compromised by the type or over-concentration of non-conventional products. Therefore, proposals will be expected to demonstrate that they contribute to mixed and inclusive communities. Alike student housing and shared living, where it is felt that there is potential for some negative impacts on mixed and balanced communities or infrastructure provision, some mitigation measures may be required where appropriate such as improvements to public realm via S106 contributions.

It is also acknowledged that some of the newer innovative housing products may have different characteristics to more conventional housing. This could be by way of different population densities, whilst other products may house people with similar characteristics and so have the potential to alter the demographic makeup of that part of the area. Therefore proposals will be expected to demonstrate how they positively contribute towards the mix and balance of the community. Shared living may also, through their managed nature, have a higher level of occupancy and as a consequence provide greater certainty about the resultant associated population and the population density. Therefore, alike the shared living policy above, information on the potential population density of the development may be sought to determine the potential impact of the scheme.

The London Plan sets out that affordable housing should be calculated on habitable room basis which has been included within policies SP.2 and H.2. Policy H.2 sets out general affordable housing requirements which should be adhered to for proposals for self-contained accommodation falling within C3 use and contributions towards off-site C3 affordable housing for shared living accommodation which is not C3. This principle has also been enshrined within Policy H.8 to allow for the circumstances where the housing use is demonstrably sui generis and not C3 use. There may be other exceptions to the general affordable housing requirements such as where the innovative nature of the proposal means that habitable rooms is not the best means of calculation. Therefore, the Local Plan sets out that the calculation by residential unit of floorspace may be more appropriate for some forms of delivery, however this should be broadly equivalent to what would be required by habitable room.

Similar to shared living and Build to Rent products, innovative housing products should be appropriately managed. Dependant on the type of scheme, a Management Plan may be required to ensure the development is appropriately managed and maintained to ensure the quality of the development and local amenity.

The Legacy Corporation is also aware of the role of home-based working and its particular relevance with the area. Although evidence is suggesting that there has been a rise in home-based working this could also be a symptom of wider economic issues rather than being an option of preference. The Economic Strategy within Local Plan seeks to provide and diversify the employment provision within the area and a key part of this is provision of flexible and adaptable and in some cases affordable or low-cost accommodation, suitable for the operation of small businesses capable of being shared with a living environment. The Work Live Study (2014) looked at case studies and examples of typologies where work and living elements are combined. However, the history of live-work provision within the area and more generally has often proved problematic with many purpose-built schemes being converted into residential accommodation. A good local example being a scheme at 419 Wick Lane where all 112 live-work units were changed to residential use. The Hackney Wick and Fish Island SPD sets out some principles of likely requirements where live-work provision is proposed. Therefore, any innovative housing products incorporating employment elements would need to justify the need for the form and type of accommodation and will only be permitted in locations where conventional residential would also be considered appropriate. However residential products with flexible space, or a unique level of specification will be considered more flexibly as an innovative housing product under this policy. Affordable housing would be required on the same basis of other forms of conventional housing.

The London Plan sets out how specialist forms of housing should be monitored. Shared living and student accommodation should be monitored on a 3:1 basis whereby older persons accommodation within C2 use will still be monitored on a 1:1 basis. The theory behind the difference is that older persons accommodation is likely to free up larger properties whereas other types of accommodation will not. Applying this principle delivery will be counted on a 1:3 basis if reducing demand on normal accommodation, or alike older persons on a 1:1 basis if freeing up existing residential.

Design policies within the Built and Natural Environment section set out external standards for residential and mixed-use development (BN.1, BN.4 and BN.10). Policy D4 of the London Plan sets out the internal space standards which should be applied to any self-contained scheme. Due to the innovative nature of the products there may be some flexibility in terms of how these policies will be applied where proposals may instead demonstrate how equivalent flexible space is provided to meet these requirements.

APPENDIX 1 PROPOSED AREAS OF CHANGES

	Reason for change
SP.2	<ul style="list-style-type: none"> • New housing targets • 35% of affordable homes on a habitable room basis • 50% on public sector owned land and industrial land if net loss of industrial floorspace capacity • Non-self contained affordable housing
H.1	<ul style="list-style-type: none"> • To reflect new Housing Requirements Study in relation to housing size and mix • To reflect new London Plan policy H12 in relation to preventing too prescriptive housing mix policies for market and intermediate housing products • Precision in relation to London affordable rented housing mix requirements
H.2	<ul style="list-style-type: none"> • To reflect new London Plan approach to affordable housing; housing products; viability thresholds and set out tenure mix requirements (H5-H8) • Affordable housing requirement by habitable room (Affordable Housing and Viability Supplementary Planning Guidance) • Amendments to the threshold of whether 10 units and above (H6) • Tenure split to be determined by evidence from the Housing Requirements Study and the viability testing with guidance from SPG
H.3	<ul style="list-style-type: none"> • To reflect new London Plan policy H15 in particular: design standards, consideration of dementia issues, updated C2/C3 distinctions, other/new forms of accommodation which can also meet identified requirements
H.4	<ul style="list-style-type: none"> • To reflect new London Plan policy H17 in particular: 35% affordable housing requirements, Securing to specific institutions to demonstrate local need and maintenance of Links to Mayor's Academic forum affordable housing rates • Circumstances where can and cannot be determined under this policy • To set out circumstances relating to where changes of use to other housing products proposed
H.5	<ul style="list-style-type: none"> • To reflect new Housing Requirement Study • New London definition of gypsy and travellers
H.6	<ul style="list-style-type: none"> • Clarification in relation to affordable housing requirements of HMO schemes
H.7	<ul style="list-style-type: none"> • PRS policy removed and redefined as part of the conventional housing supply rather than as a specialist product • New shared living policy to reflect London Plan H18
H.8	<ul style="list-style-type: none"> • New policy on innovative housing requirements to encourage diversity in housing provision.

APPENDIX 2 KEY HOUSING LOCATIONS

Site/Application number	Pre-adoption phase	Adoption phase				Total
	2018-2019	2020-2024	2025-2029	2030-2034	2035-2036	
Allocations						
SA1.1	0	307	134	25	0	466
SA1.2	0	22	86	0	0	108
SA1.3	0	324	152	0	0	476
SA1.7	0	9	0	0	0	9
SA2.4	0	0	200	0	0	200
SA3.4	0	356	1159	924	29	2468
SA4.1	76	441	612	227	0	1356
SA4.3	39	257	408	41	0	745
SA4.4	0	6	39	58	0	104
	115	1722	2791	1275	29	5932
Permissions						
LCS Sites	832	3087	2798	70	0	6787
Stratford City	595	1540	514	98	0	2747
Strand East	98	535	567	0	0	1200
Chobham Farm	110	502	251	0	0	863
Neptune Wharf	164	280	29	0	0	473
14/00374/FUL Monier Road West (Foundry)	61	0	0	0	0	61
15/00540/FUL 24-26 White Post Lane	52	0	0	0	0	52
11/90619/FUMODA 68-70 High Street	35	138	0	0	0	173
15/00338/FUL 75-89 Wallis Road and 59 Berkshire Road	9	35	0	0	0	44
14/00387/FUL 80-84 & 88, Wallis Road	24	96	0	0	0	120

Site/Application number	Pre-adoption phase 2018-2019	Adoption phase				Total
		2020-2024	2025-2029	2030-2034	2035-2036	
06/90011/FUMODA 80 - 92 High Street	101	0	0	0	0	101
15/00598/FUL Duncan House	9	35	0	0	0	44
16/00685/FUL 415 Wick Lane	35	140	0	0	0	175
15/00278/FUL Bream Street	40	162	0	0	0	202
15/00392/FUL Land at Cooks Road	39	157	0	0	0	196
14/00422/FUL Marshgate Lane	0	254	0	0	0	254
10/90285/FUMODA Manhattan Loft Gardens	124	0	0	0	0	124
15/00416/FUL 52-54 White Post Lane	5	50	0	0	0	55
15/00446/FUL 1-2 Hepscott Road	10	20	0	0	0	30
16/00462/FUL 1-7 Dace Road	22	88	0	0	0	110
PA/11/02423/LBTH Bromley by Bow North Phase 2	56	0	0	0	0	56
14/00326/FUL 127 Wallis Road	1	0	0	0	0	1
16/00513/FUL 6 Brinkworth Rd	1	0	0	0	0	1
17/00170/FUL 154 High Street	2	0	0	0	0	2
17/00058/FUL Units 123, 123a and 124 Omega Works	2	0	0	0	0	2
16/00470/FUL Unit 125, 125a And 126 Omega Works	3	0	0	0	0	3
15/00387/PNCOU Wingate House	5	18	0	0	0	23
13/00404/FUM (*REM amended) Alumno, 206-214 High Street	223	0	0	0	0	223

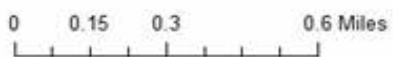
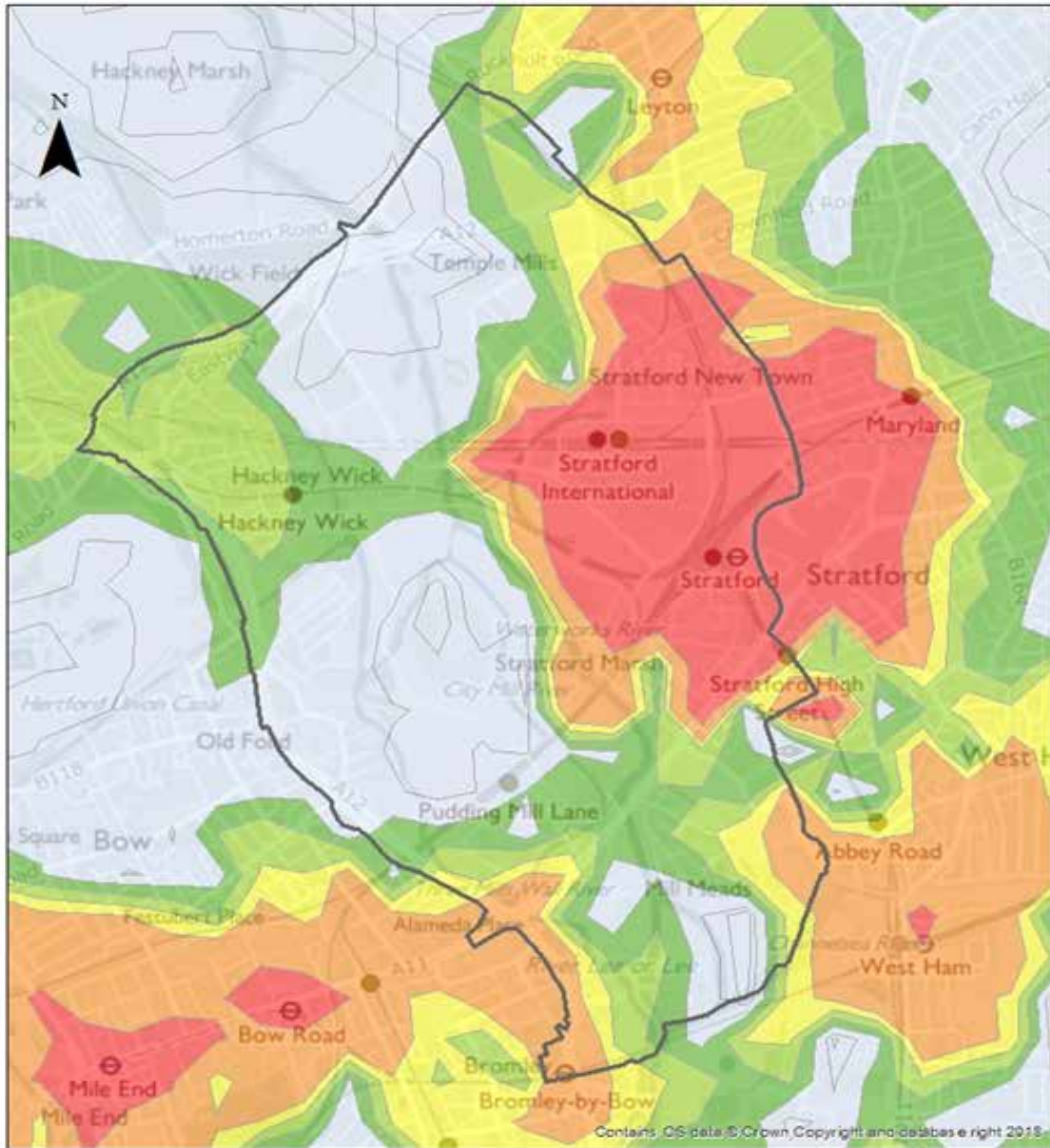
Site/Application number	Pre-adoption phase	Adoption phase				Total
	2018-2019	2020-2024	2025-2029	2030-2034	2035-2036	
15/00598/FUL Duncan House student accommodation	102	409	0	0	0	511
14/00260/FUL 4 Roach Road, Fish Island, London, E3 2PA	25	0	0	0	0	25
13/00204/FUM Monier Road East	36	0	0	0	0	36
13/00322/FUL Land On The Northern Side Of Great Eastern Road	91	0	0	0	0	91
17/00230/FUL 180, High Street	1	6	0	0	0	7
17/00344/FUL BBB Lindhill	81	326	0	0	0	407
18/00084/FUL Flat 501 Omega Works	0	1	0	0	0	1
18/00101/DEM Rear of 59 Wallis Road	0	4	0	0	0	4
17/00430/FUL Lock Building	0	9	0	0	0	9
17/00364/FUL Danescroft	98	393	0	0	0	491
	3088	8284	4159	168	0	15699
Additional capacity						
Sub Area 1	35	767	678	359	7	1846
Sub Area 2	0	83	131	0	0	214
Sub Area 3	0	1188	948	176	130	2442
Sub Area 4	0	24	96	6	2	128
TOTAL	35	2061	1854	541	139	4630
ALL	3238	12067	8804	1984	168	26261

APPENDIX 3 BARTRIP STREET MEETINGS

Date	Parties present	Matters discussed
03.04.2017	TfL Commercial LLDC Planning Policy	<ul style="list-style-type: none"> Update on history of the allocation of the site from LLDC. It was agreed that the email chains where TfL agreed the allocation of the site for gypsy and traveller accommodation be sent across Update on TfL workstreams. Still pursuing best value for all the sites under TfL ownership
07.07.2017	LLDC Planning Policy LB Hackney- Planning LB Hackney- Property	<ul style="list-style-type: none"> Background and update, site history London Borough of Hackney political support for site and approaching GLA LLDC to conduct transport assessment of access options for the site Specific site assessment- noise, air quality and contamination and investigation of blanket TPO, small part of site in flood zone 2 Fund availability, investigate potential LBH money and S106 Need to secure TfLs commitment to the site so need to secure a meeting
25.07.2017	LLDC Planning Policy LGTU Opinion Research Services LB Hackney- Planning	<ul style="list-style-type: none"> Housing Requirements Study (including GTAA) methodology LGTU assistance with engagement
27.09.2017	LLDC Planning Policy LB Hackney- Planning LB Hackney- Property GLA- Housing & Land TfL Commercial	<ul style="list-style-type: none"> LLDC update and new evidence TfL no longer in support of the allocation for gypsy and traveller use and are working on residential proposals Previous discussions that took place with TfL talked about taking on the lease Local Plan position and suitability for gypsy and traveller use only Potential GLA funding towards delivery in Affordable Homes Programme Seeking some clarity from the GLA with respect to the different positions of LLDC and TfL
11.05.2018	LLDC Planning Policy LB Hackney- Planning LB Hackney- Property GLA- Housing & Land	<ul style="list-style-type: none"> LLDC evidence base update- transport assessment and Housing Requirements Study Hackney member support but no current legal interest in the site Funding- potential use of S106 funds Detailed site investigation required but need TfL information on its intentions for the site prior to this Separate TfL/GLA meetings taking place and TfL need to consider its different land disposal options GLA potential Affordable Homes Programme funding but this would need to be on site by March 2021. GLA Innovation fund also has potential
17.07.2018	LLDC Planning Policy LB Hackney- Planning GLA- Housing & Land	<ul style="list-style-type: none"> Likely that TfL to agree commercial terms of a lease Need funding for the initial site assessment work before seeking GLA funds for the delivery- s106 availability for this stage Need ownership of the project which would only sit with LB Hackney once secured interest in the land
03.10.2018	LLDC Planning Policy LB Hackney- Planning LB Hackney- Property GLA- Housing & Land	<ul style="list-style-type: none"> TfL/LB Hackney property discussions to take place Funding streams

APPENDIX 4 PTAL AND CHARACTERISATION MAPPING

PTAL map (3 to 6b)



Characterisation mapping

