

POLICY H1: Housing Supply

OPDC will support delivery of a minimum of **22,350** new homes during the Plan period. This new housing will be achieved through:

- a) supporting proposals that contribute to the delivery of a minimum annual housing target of **1,110** homes, where these accord with other Local Plan policies;
- b) delivering a minimum of **21,400** homes on Site Allocations, supporting the achievement of the housing targets identified within the Place policies;
- c) supporting applications for self-build and custom-build, where these accord with other Local Plan policies;
- d) optimising the use of existing housing, in accordance with Policy H5;
- e) monitoring delivery annually and publishing information on the rate of housing starts and completions and the trajectory of a deliverable and developable housing supply; and
- f) working with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London.

- This policy says the OPDC will support the delivery of 22,350 homes during the period of this plan with an annual target of 1,100 net per annum.
- The site allocations total 21,400.
- The level of need is assessed in the OPDC's evidence based document – its Strategic Housing Market Assessment (SHMA). It has to assess need in a housing market area. The area covered is the three boroughs of H&F, Brent and Ealing).
- They plan says 5,900 will be delivered the first 5 years. Numbers might be delivered will fluctuate of the time period, dependent on developments coming through. They are required by government to set out a trajectory of how much they will deliver and when (in the appendix).
- There is a development capacity study provides the evidence to support the target setting out where and what developments will take place – where there will be high-rise and at what height. They have carried out an update of this document. It doesn't really provide proper analysis on what it might be reasonable to deliver, rather it takes the numbers from the 2014 London Plan and shows how they might be squeezed in.
- The reg 18 Local Plan prosed there should be more sensitivity at the edges (adjacent to existing the lower rise housing around the OPDC) but that seems to have gone. They are already approving planning applications on Scrubs Lane that are high rise.
- Developments are coming through quite quickly. Those approved are North Kensington Gate, are a 22-storey building and another from 2 separate funding applications by the same developer. The Genesis Oakland one. Another going to the planning committee in July for mitre yard) and one here coming up quite soon.
- This is a lot in a short period of time. Another is coming through in Park Royal. There was a planning forum about this a few days ago. It is expected to be determined in Sept / October.
- Others are coming though in North Acton which are still being determining by Ealing. Imperial College has submitted one recently. N Acton already has a huge rash of high rise developments. When the OPDC was established, there was an agreement with

	<p>Ealing that they would continue to determine the planning applications in that area as they had had the relationship with the developers. These are not only high-rise but very close together. Much housing is transient student or private rented housing, not any social / affordable rents. The one that has already been approved is 6 portal way (42 storeys) and there is the perfume factory which has outline planning permission for a development by Essential Living. These are private rental units. Imperial is now putting in an application on their part, making it even more dense. There is another at an early stage – 2 portal way. There is a little bit of industry in the existing building relating to food. The idea is to retain this at the ground floor and build homes above.</p> <ul style="list-style-type: none"> • This is a worry for many – there is no real stomach for high rise here. Its alien; like a bit of central London being plonking down in a traditionally relatively low-rise housing area. Much of this seems to be about meeting demands from the Mayor’s office in terms of housing delivery. • Often developers say they have to go high in order to be able to deliver the required numbers of social housing – except in the instance of Oaklands there some social/ affordable rent housing but often it tends to be intermediate rather than social / affordable housing. So social housing has not been delivered through building high. • Many housing associations say they do not want to take on housing in taller buildings as management and maintenance is costlier and many social housing tenants prefer to be in lower rise housing. • There is of course lot of very good high-rise housing including social rented, and actually there is no reason that you can’t have a god mix of social and community infrastructure within the buildings – although this doesn’t happen that often. • They is a policy on tall buildings (in the design section) but they don’t talk about enhancing social and community infrastructure in that. They only seem to think about the social and community infrastructure afterwards. They talk about linking this policies in the housing chapter.
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	<ul style="list-style-type: none"> • The housing chapter talks about policy such as numbers of homes to be delivered, affordable housing, housing mix (sizes), existing housing, build to rent, housed in multiple occupation, gypsy and travellers' specialist and student housing. • One of the things they suggest around family dwellings (a policy around the design of family housing) they suggest that this should be at the ground floor or first floor with direct access to gardens or private or collective open spaces. • Some boroughs specify that family housing should be on the ground floor but not usually in central London boroughs.
POLICY H2: Affordable Housing	<ul style="list-style-type: none"> • Isn't the problem here that most of this housing is not aimed at the people on lower incomes? As we talked about before, the developers are homing in on Scrubs Lane. Most of these are not going to meet the needs for people who are in desperate need for housing here or across London. Ordinary working-class people, people on the housing waiting list. And actually, unaffordability is a problem for a greater and greater number of people. • The Mayor has produced a housing affordability and viability supplementary planning document. While it's not formally policy yet, it would have material consideration. The current London Plan has a numerical target for affordable housing which is the equivalent to 40% of the total housing target. 60% of that is for social/affordable rent homes and 40% intermediate. The London Mayor is setting a 50% affordable housing target, but is to be achieved by having a lower target for social / affordable rent homes and higher percentage of intermediate housing. The draft Local Plan suggests 30% social/affordable rent homes (of the total affordable housing target). • A new form of intermediate housing called London Living Rent has been introduced. • The OPDC's SHMA looks at the number of households in the three boroughs that can't meet the cost of market-priced housing and from that assess how much affordable housing is needed. Then who can afford social or intermediate housing. • There is a need for 44,400 affordable homes (45%) of a total of 99,000 homes needed over a 20-year period (in the three boroughs). Only 6,300 (14%) would be able to meet

All residential developments, with the capacity to provide 10 or more self-contained units (or have a gross residential floorspace of more than 1,000 sqm) will be required to provide affordable housing, subject to viability, in accordance with the overarching 50% target set out in Policy SP4, by:

- a) applying the threshold and viability approach as set out in Mayoral guidance (except for Build to Rent, see Policy H6);
- b) including early and advanced stage review mechanisms in line with Mayoral guidance, to maximise the delivery of affordable housing where development viability improves;
- c) providing 30% of affordable housing as London Affordable Rent and 70% as a range of Intermediate housing, including London Living Rent and London Shared Ownership (except for Build to Rent, see Policy H6) and including units that are affordable to households on average incomes in the host local authorities;
- d) providing affordable housing in perpetuity;
- e) appropriately distributing the affordable housing throughout a new development and ensuring that they are designed to a high quality, with the same quality of external appearance as for market housing;
- f) providing affordable housing on-site. In exceptional circumstances and in all proposals under Policy H7, a financial contribution may be accepted by OPDC in order to provide affordable housing off-site where other sites may be more appropriate to provide affordable housing than the site of the proposed development;
- g) applying Vacant Building Credit only where it is verified that:
 - i) a building is not in use at the time the application is submitted;
 - ii) a building is not covered by an extant or recently expired permission;
 - iii) the site is not protected for an alternative land use; and

vacant for at least five years:
 sole purpose of redevelopment and has been
 iv) the building has not been made vacant for the

the cost of intermediate housing. Around 7% could afford London Living Rent and a further 7% shared-ownership/other lower cost home ownership. 86% can only afford social rented homes.

- There has been some questioning at the OPDC planning committee from local H&F councillors asking what they are going to get out of this big development, in terms of meeting the need of people on their housing waiting lists.
- They have also had some discussion on the cost of London Living rent in the area, but not on the numbers who might be able to afford it.
- The Mayor's office says that those able to access LLR are middle income earners who are working, are already renting and can afford to put money away to buy or part buy a home. The minimum tenancy period for these homes is three years. LLR is based on a third of average incomes, slightly different to affordable rents, which were based on a percentage of market rents (of up to 80% market rent). However, it's hard to see if there will be much difference. Market rents are high in the same areas where average incomes are also high – such as in central London. The LLR rent is worked out on a ward by ward basis.
- In College Park ward the rent for a one bed LLR would be £868 pm
- A 2-bed LLR flat in Harlesden ward would be £787 pm, in Stonebridge £855, in College Park £959 and in East Acton £905.
- They are very much above social rents, on average 69% market rents.
- The median household income level in London is around £39,000. That's a surprisingly high figure – when you think how many are earning only £20,000.
- Do we think the third of income is gross or net?
- There are going to be a lot of households earning a lot less than the median level and are never going to be able to meet the cost.
- Only 7% of households who need affordable housing.
- What happens to all the people in between, ordinary working-class people who can't afford private rents, London Living Rents and won't qualify for social housing?

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| | <ul style="list-style-type: none">• That's me. I've been homeless for the last 10 years, I've been living without running water and a 600m walk to a toilet. This is how people live. I don't qualify for social housing and never will. I definitely can't buy a house and never will.• People in Brent, Ealing and H&F just won't get the type of housing that they need and will end up in private-rented homes that they can't able to afford without access to housing benefit and increasingly will find that this will be outside of London.• The SHMA already note high levels of overcrowding and hidden homelessness and this can only increase.• It was asked earlier this afternoon if it would be better to deliver less total affordable housing, but more social-rented/ London Affordable rent homes. The answer is, if there is genuinely an attempt to meet identified need, probably yes.• There are hundreds of thousands of people in this situation and even a housing crash would be unlikely to help.• Age concern is saying there is a large group of people between the ages of 35/40 all the way up to pensioners who are in private rented accommodation and they are predicting a crisis of homelessness in the future for these people.• With all the housing in this plan – none of it is meeting identified need.• I worked in the past for the government and as an architect – but looking at this plan, it's insane, none of this has any relationship with the real world.• The solution is either have a housing crash or build so many houses that it crashes anyway, regardless of whether they are affordable or not. They are just not affordable.• The delivery of home is being controlled by the developers. so that homes don't reduce in value.• Sadiq Khan seems to think that if we build loads of homes the cost of market homes will reduce, but I think he is living in a fantasy world.• Also, if all the homes delivered were public housing then we would get homes that were really affordable. The only time that we had homes that people could afford to buy was when there was also a lot of council homes being built. |
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| | <ul style="list-style-type: none">• I was a teacher, but I got council housing. Shouldn't we not aspire to that again?• The more you look at this the more you know that this is rubbish – and this is smart people putting this together.• The terrible thing also is that housing delivery is also hinged on viability. Planning authorities are supposed to assess the need for housing, and they are also required to look at deliverability – which is actually dependent on viability (effectively profit margins and available government funding dished out by the Mayor's office). But there is never any match to housing need.• The question to Sadiq Khan is "how many market homes do we have to build before the prices start to come down?"• There have been a couple of studies recently that challenge this as a theory, presumably based on the fact that in the current situation we just can't build enough to reduce the demand right down.• We are just filling London with homes for overseas investors. When do we ever satisfy that demand?• We haven't discussed Brexit and whether or not London will stay as desirable in this respect and indeed how many will be able to stay in London.• I don't think that this will make much difference. I don't I think the market for this is Europe, it's a lot further away.• The public sector need to build housing that is affordable.• These arguments must surely be presented at the examination hearing.• The OPDC is very clear in the text that there is massive unmet need saying specifically there is a need for 86% of the affordable housing needs to be social rented.• Why is viability so important?• Because of the dependence on the developers to build and because there is insufficient public-sector funding to deliver the home's needs.• The planners are quite honest about this. |
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<p>POLICY H3: Housing Mix</p> <p>New residential developments should deliver a mix of dwelling types and sizes, taking into account the following considerations:</p> <ul style="list-style-type: none"> a) providing 25% of all units as family housing (3 beds plus), including OPDC's most up to date Strategic Housing Market Assessment compliant mix for London Affordable Rent; b) optimising the proportion of family housing beyond 25% where this is appropriate; c) all self-contained housing will be required to meet the London Plan and national housing space standards; d) housing should be appropriately and flexibly designed to respond to changing needs over time; and e) sites should deliver 90% of units as Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures, except where proposals are delivered in accordance with Policies H7 and H10. 	<ul style="list-style-type: none"> • The reg 18 Local Plan talked about 53% of affordable housing being family sized homes. • The SHMA identifies that 54% of market homes and 51% of affordable homes need to be family sized (3 bedrooms or more). • The Local Plan proposes 25% (only half of need) should be family sized homes or more where appropriate.
<p>POLICY H4: Design of Family Housing</p> <p>New housing developments should deliver family housing in accordance with Policy H3 taking into account the following considerations:</p> <ul style="list-style-type: none"> a) Where it is appropriate family housing should be located: <ul style="list-style-type: none"> i) at the ground or first floor of developments with direct access to a garden or other secure private and/or communal open space for doorstep play; and ii) close to usable public open space and appropriate social infrastructure. b) Where family housing is located on other levels, applicants should provide convenient access to secure private and/or communal open space that is suitable for children. 	

POLICY H5: Existing Housing

OPDC will:

- a) resist the loss of existing residential accommodation, unless:
 - i) it is located within Strategic Industrial Location (SIL);
 - ii) the proposal would result in new housing being provided at an equivalent or higher density, measured by unit numbers and floorspace; or
 - iii) its loss is critical to unlock the comprehensive regeneration of the area.
- b) work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham and other stakeholders to bring vacant residential properties back into use, including where appropriate, the use of empty dwelling management orders or compulsory purchase powers;
- c) permit residential conversions of existing dwellings to two or more dwellings where:
 - i) at least one family sized unit (3 bed+) is provided through each conversion with access to private or communal open space;
 - ii) the converted dwellings meet the required National and London Plan space standards;
 - iii) residential conversions maintain the amenity of neighbours, the general character of the surrounding area and do not result in cumulative stress on services, unless it is appropriately mitigated; and
 - iv) the proposal would not result in adverse impacts on parking and/or other local amenities.

POLICY H6: Build to Rent

OPDC will require new self-contained purpose built Private Rented Sector (PRS) accommodation to:

- a) provide affordable housing in the form of intermediate rental products in accordance with Policy H2 with the exception of parts (a) and (c) of that policy;
- b) be under single ownership and management, subject to a covenant for at least 15 years and in the event that any units are sold out of the Private Rented Sector a clawback mechanism will be used to secure appropriate affordable housing contributions;
- c) provide a Residential Management Plan; and
- d) offer longer-term tenancies of at least 3 years.

<p>POLICY H7: Purpose-Built Shared Housing and Existing HMOs</p> <p>Proposals for new purpose-built shared housing schemes will be supported where they:</p> <ul style="list-style-type: none"> a) demonstrate that they contribute to the creation of mixed and balanced communities by not undermining the delivery of conventional self-contained housing supply; b) are located in appropriate locations that can absorb intensive usage; c) incorporate a high quality of design and shared space for occupants; d) provide a Residential Management Plan; and e) offer a commuted sum in lieu of the provision of on-site affordable housing. <p>Proposals for conversions or loss of existing shared housing will be supported where they:</p> <ul style="list-style-type: none"> f) no longer meet identified local need for shared housing; g) do not comply with any relevant standards, including quality; h) are not located in areas with a high public transport access level and facilities and services such as shops and social infrastructure; or i) give rise to unacceptable impacts on amenity. 	
<p>POLICY H8: Gypsy and Traveller Accommodation</p> <ul style="list-style-type: none"> a) The existing Bashley Road Gypsy and Travellers Site will be protected for its current use; b) OPDC will give careful consideration to the future needs of gypsies and travellers and work with the London Boroughs of Brent, Ealing and Hammersmith & Fulham to secure a sufficient supply of plots/pitches to meet the needs of existing and future gypsy and traveller households (including travelling show people); c) Any new sites, pitches and/or plots for travellers should: <ul style="list-style-type: none"> i) be accessible to public transport, services and facilities and be capable of support by local social infrastructure; ii) be capable of connection to energy, water and sewage infrastructure; iii) provide safe access to and from the main road network; and iv) support the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality. 	

<p>POLICY H9: Specialist Housing</p> <ul style="list-style-type: none"> a) OPDC will support the delivery of specialist housing; b) Development proposals providing 1,000 or more homes will be required to provide 10% of units as specialist care and supported needs housing for older people and/or vulnerable people; c) OPDC will require proposals for older persons or other specialist housing units to be: <ul style="list-style-type: none"> i) appropriate for the intended occupiers in terms of the standard of facilities, the level of independence and the provision of support or care; ii) of a high design quality, including inclusive design and provision of adequate internal and external space; iii) accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers; and iv) accompanied by a Residential Management Plan. 	
<p>POLICY H10: Student Accommodation</p> <ul style="list-style-type: none"> a) Student housing will be supported where it: <ul style="list-style-type: none"> i) contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period; ii) is located in areas with high PTAL and is easily accessible by non-motorised forms of transport and close to local amenities and designated town centres; iii) does not undermine the delivery of conventional self-contained housing supply and housing targets; and iv) does not result in an overconcentration in any one specific location; b) Proposals must provide a Residential Management Plan; and c) Where the proposal is not linked to a specified educational institution it will need to provide the maximum reasonable amount of affordable student accommodation, subject to viability. 	