

7

# HOUSING



# Housing

This chapter contains policies addressing the following policy themes:

- H1: Strategic Policy for Housing
- H2: Housing supply
- H3: Housing mix
- H4: Affordable housing
- H5: Existing housing
- H6: Housing in the Private Rented Sector
- H7: Houses with shared facilities
- H8: Specialist housing
- H9: Gypsy and Traveller Accommodation
- H10: Student housing

## Questions:

**QH<sub>a</sub>:** Are there any other housing policy themes that you think OPDC's Local Plan should be addressing?

**QH<sub>b</sub>:** Do you agree with the chapter's preferred policy options? If not, what might you change?

**QH<sub>c</sub>:** Are there any other policy alternatives that could replace the chapter's preferred policies?

Please note that Policy H4 does not have a preferred policy option and there are a series of separate questions relating to this policy on page 171.

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

## EVIDENCE BASE

Table 5: Housing Evidence base

Supporting study	Description	Status
<b>OPDC Strategic Housing Market Assessment (SHMA)</b>	The Strategic Housing Market Assessment (SHMA) identifies the objective housing need across tenures for the OPDC area and a wider catchment covering the London Boroughs of Brent, Ealing and Hammersmith and Fulham.	Draft completed
<b>OPDC Gypsy and Traveller Accommodation Needs Assessment (GTANA)</b>	The Gypsy and Travellers Accommodation Needs Assessment will identify the specific housing needs of the Gypsy and Travellers community.	Draft in development
<b>OPDC Affordable Housing Viability Assessment</b>	The study tests the viability of affordable housing across Old Oak and Park Royal.	To be developed
<b>OPDC Development Capacity Study (DCS)</b>	A study looking at the capacity of the OPDC area to accommodate new homes and jobs.	Draft completed





# H1: Strategic policy for housing

## KEY ISSUES

1. The delivery of new homes to meet housing needs is a critical issue facing the UK.
2. Central government has:
  - a. introduced reforms to the planning framework to speed up delivery of new homes. The draft Housing and Planning Bill (2015) proposes measures to boost housing supply and home ownership
  - a. set a target to deliver an additional one million homes by 2020, including 200,000 Starter Homes.
3. Old Oak and Park Royal has a key role in delivering much needed new housing within London.

## POLICY CONTEXT

### National

- 7.1 The National Planning Policy Framework (NPPF) states that local planning authorities should:
- objectively assess the housing needs for market and affordable housing;
  - identify key sites critical to the delivery of its housing strategy, (over the next five, ten and where appropriate, fifteen years); and
  - demonstrate expected rates of housing delivery.

### Regional

7.2 Housing Policies in the London Plan (2015) recognise London's pressing need for new housing. The Plan:

- identifies a London-wide housing need for between 49,000 – 62,000 new homes per year between 2015-2036
- sets annual average housing supply targets for London boroughs on the basis of an annual average supply of 49,000 new homes
- states that the supply of new housing should comprise a range of housing types, sizes, tenures and include a percentage of (wheelchair) accessible homes.

### PREFERRED POLICY OPTION

OPDC will work to ensure the area plays a crucial role in delivering a range of high quality housing that addresses London's housing requirements. This will be achieved through encouraging:

- a. the delivery of new housing, where it accords with other policies in this Local Plan;
- b. a mix of housing types and tenures to meet a wide variety of needs; and

c. developments to be flexible and adaptable to accommodate future need, innovation and smart technologies.

### JUSTIFICATION

7.3 The OPDC area covers two of London's Opportunity Areas (Old Oak and Park Royal) which are identified in the London Plan as having capacity to provide a minimum 25,500 new homes. The area will help play a critical role in meeting London's strategic housing need and in meeting local need. To support this, OPDC will actively promote the development of land for housing, where development proposals accord with other policies in this draft Local Plan.

7.4 Given the scale of new homes that could be delivered in the area, OPDC has set up a housing advisory group of experts to help it develop its policies and strategies and plan for and deliver a wide range of housing types and tenures. This will include affordable housing, starter homes, low cost market

housing, private rented sector (PRS) and open market housing. There is also an opportunity to plan and deliver a range of housing products aimed at specific groups, such as students or older people.

7.5 It is imperative that OPDC delivers a lasting legacy of high quality housing by providing 'Lifetime Neighbourhoods'. Housing design, both internally and externally and across all housing tenures and types, will be expected to be exemplary. It will need to incorporate the highest standards of modern design and flexibility that can accommodate smart and innovative technologies from the outset. As well as this, it will need to cater for a wide variety of needs promoting consideration of aspects such as natural lighting, ventilation and the efficient use of space. High-quality housing is a key determinant of good health and well-being. OPDC will encourage developers to consider positively impacting on mental and physical health through the quality of

## ALTERNATIVE POLICY OPTION

7.6 No suitable policy alternative has been identified as an alternative would not be consistent with the NPPF or in general conformity with the London Plan.



Figure 76: St. Andrews, Bow

# H2: Housing supply

## KEY ISSUES

1. London's population is projected to grow to over 11 million by 2050 and will need a supply of new housing to accommodate it.
2. OPDC will play an important role in meeting the need for new housing identified in the London Plan - a requirement for 49,000 new homes per annum across London – by delivering a minimum of 25,500 new homes.
3. OPDC's Local Plan policy will need to demonstrate what proportion of the 25,500 target is feasible to deliver within the plan period over the next 20 years, considering issues such as site availability, deliverability and market needs.

## POLICY CONTEXT

### National

7.7 To significantly boost the supply of housing, the NPPF states that local planning authorities should:

- meet the full objectively assessed needs for market and affordable housing and identify key sites for the delivery of housing;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years-worth of housing;
- identify a supply of specific, developable

sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 and for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

### Regional

7.8 The London Plan (2015) identifies London's housing need and provides detail on meeting this need though increasing housing supply. The potential for the area to accommodate a minimum 25,500 new homes is set out in annex one of the London Plan.

## PREFERRED POLICY OPTION

OPDC will support delivery of new homes during the Plan period (2017-2037). This new housing will be achieved through:

- a. Setting an annual housing target;
- b. Promoting the development of sites identified within the Development Capacity Study (DCS);
- c. Promoting development opportunities on windfall sites, where

- these accord with other Local Plan policies;
- d. Working with the London Boroughs of Brent, Ealing and Hammersmith and Fulham to bring vacant dwellings back into use;
- e. Supporting housing conversions and changes of use to residential where this accords with other Local Plan policies; and
- f. Monitoring delivery and publishing information on the rate of housing starts and completions and the trajectory of deliverable and developable housing supply.

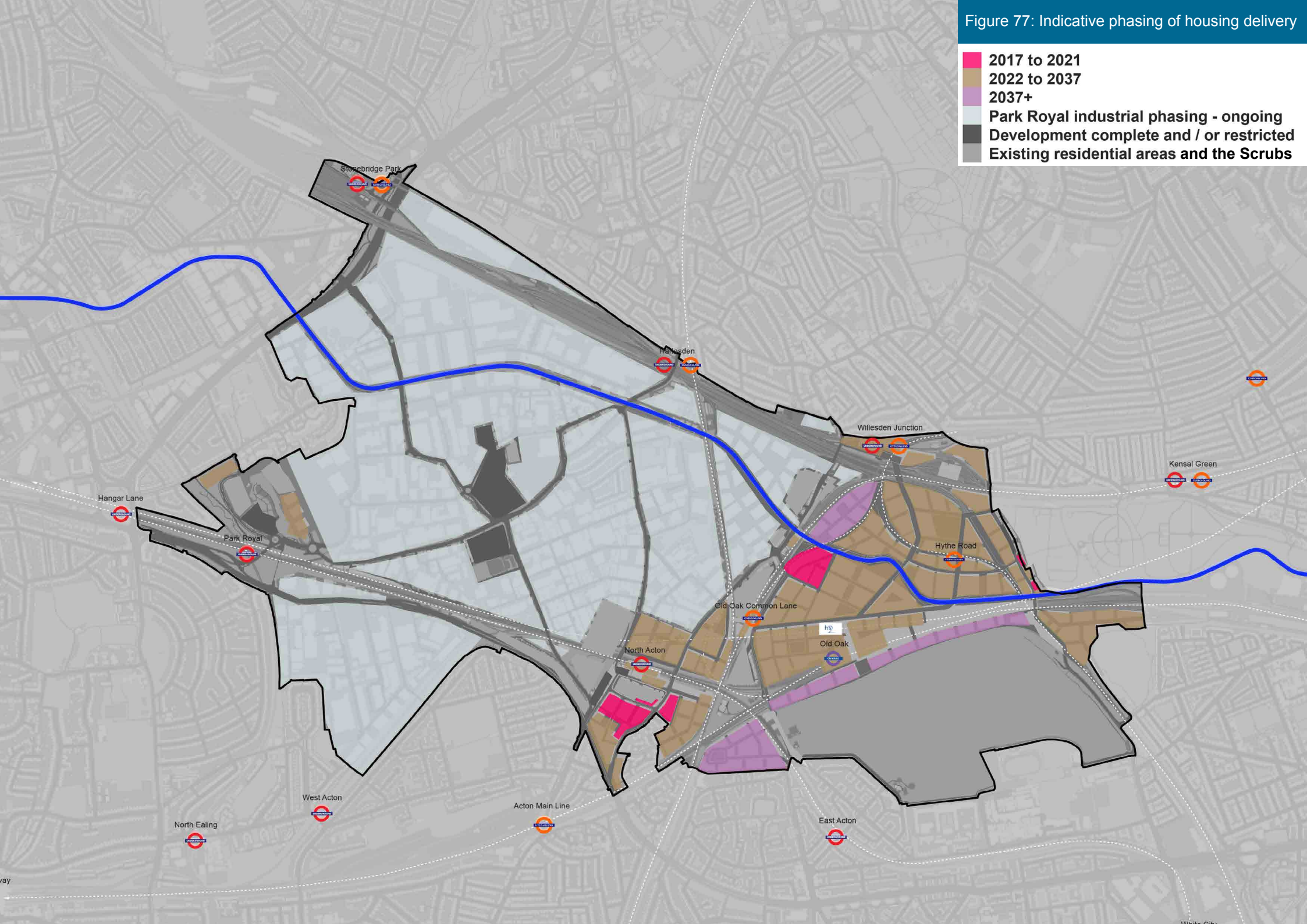
## JUSTIFICATION

7.9 London is a global city experiencing a period of rapid population growth. This, coupled with a slow rate of housing delivery has resulted in a widening gap between housing supply and demand. The 2011 census shows that London's population is growing faster and in ways previously not forecast leading to London's Strategic Housing Market Assessment identifying a housing requirement of between 49,000 and



Figure 77: Indicative phasing of housing delivery

- 2017 to 2021
- 2022 to 2037
- 2037+
- Park Royal industrial phasing - ongoing
- Development complete and / or restricted
- Existing residential areas and the Scrubs



62,000 new homes per year. Figure 78 shows the projected population for the three authorities covered in the OPDC area.

7.10 The NPPF requires local planning authorities to 'ensure that their Local Plan meets the full, and objectively assessed, needs for market and affordable housing in the housing market area'.

7.11 Based on the area's current population of 7,000 people and 2,800 households and following national and regional guidance for preparing a Strategic Housing Market Assessments, OPDC's work identifies an objectively assessed housing need for the OPDC area of 1,200 homes, of which 564 as affordable housing, over the plan period up to 2037.

7.12 However, as London's single largest regeneration scheme and recognising that existing guidance for producing a SHMA is based on a standard local planning authority and not one created through a Mayoral Development Corporation, the OPDC area can deliver new homes far in excess of this objectively assessed housing need and so needs to look wider than just its immediate boundary.

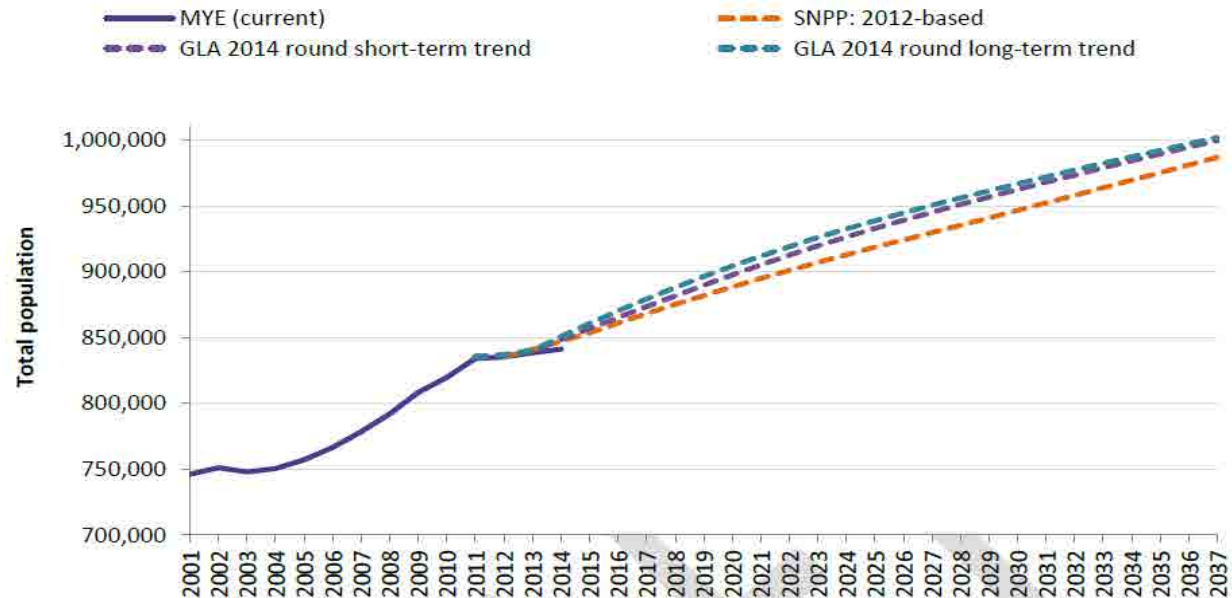


Figure 78: Projected population

7.13 In realising its wider strategic role and in supporting west London's housing needs, the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham has been identified as OPDC's housing market area in OPDC's draft SHMA. In adopting this approach, a much wider demographic base is included in the population projections. The draft SHMA identifies a housing need for 96,000 homes across this housing market area over the plan period. Within this, the SHMA identifies an objectively assessed need for 44,800 (48%) affordable units and 48,400 (52%) market units.

7.14 The draft DCS identifies the indicative phasing for the areas to be brought forward for residential development (subject to known constraints). The table below provides further details on the first five-year supply of housing (deliverable) as well as sites for the next 6-20 years (developable). The draft DCS shows that the OPDC area could meet almost 25% of the housing market areas' objectively assessed need over the next 20 years.

7.15 Table 6 and figure 77 sets out the delivery phases for housing development. Many of these areas



cannot be brought forward in advance of 2026, as they rely on the opening of the Old Oak Common station and/or are reliant on the release of land required up until or after this date.

7.16 Further work is being progressed to identify other areas likely to come forward and contribute to OPDC’s first five-year housing supply (deliverability), OPDC will also identify an annual delivery target following this further work. Further details will be provided in the next iteration of the Local Plan.

7.17 There may also be other ‘windfall’ sites that have not yet been identified in the DCS. They may make a contribution to the supply of new housing. As part of this consultation we are inviting suggestions for additional sites that could help contribute towards meeting London’s growing housing need through a ‘call for sites’.

7.18 Changes of use to residential and housing conversions can also contribute to the overall housing supply. Changes of use will be supported where they accord with other draft Local Plan policies. The appropriateness of housing conversions is covered in Policy H5.

7.19 Monitoring new housing delivery

Table 6: Early indicative housing delivery

Years	Development Phase	Delivery Phase	Unit Delivery
0-5	2017 - 2021	1	2,100
6-20	2022 - 2037	2	19,600
20+	2037+ (post plan period)	3	4,000

will be vital to achieving the broader objectives and OPDC will report on the number of new homes started and completed in its Authority Monitoring Report (AMR). The AMR will also contain a housing trajectory which will show annual updated information on OPDC’s 0-5 year, 6-10 year and 11-15 year housing supply.

### ALTERNATIVE POLICY OPTION

#### 1. Seek to deliver a higher number of new homes within the Local Plan period.

7.20 This option is unlikely to be achievable as there are significant infrastructure and delivery issues that would need to be overcome to free up all sites for development within the plan period. Further information on site availability is set out in the DCS.

### Questions:

**QH2a:** Do you agree with the approach OPDC is taking to its objectively assessed housing need? If not, please explain why.

**QH2b:** Do you agree with sites identified for the first 5 years in figure 77?

**QH2c:** Are there sites, that have not been identified as providing the first five year supply (2017-21), that you consider can be brought forward to deliver housing in this period?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

# Call for sites consultation

7.21 OPDC's draft Development Capacity Study identifies land that OPDC is currently aware of that can be developed for housing. It identifies the potential phasing showing when they may come forward for delivery, based on currently available information.

7.22 As well as areas identified in the DCS for development, OPDC are as part of this consultation inviting suggestions for additional sites that could support development through a 'call for sites.' This will assist OPDC to meet its obligations under the NPPF and assist in implementing the 'presumption in favour of sustainable development' when planning decisions are taken.

## Questions:

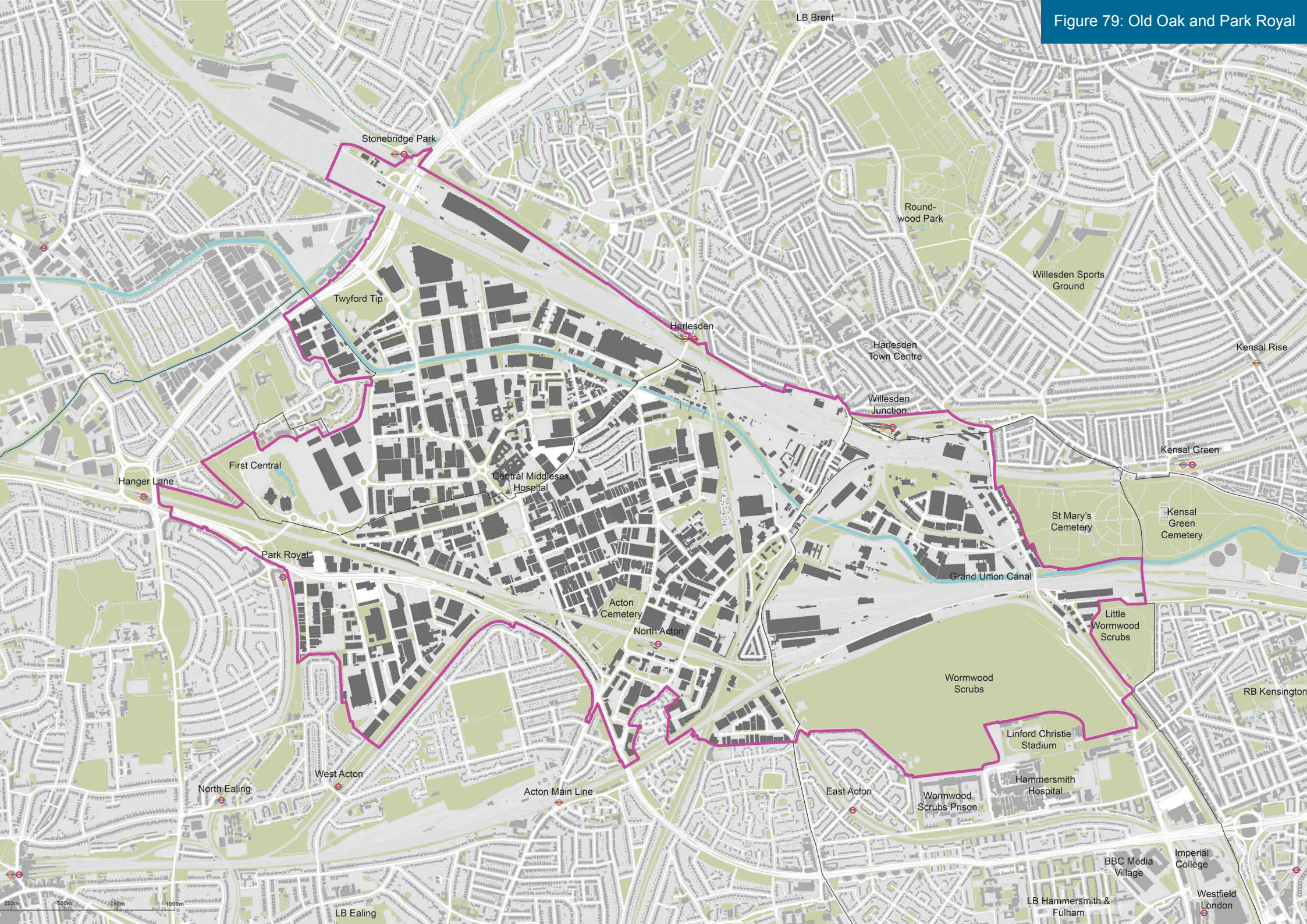
**QH2d:** Are there any sites excluding those already identified in OPDC's Development Capacity Study (DCS) or sites designated as Strategic Industrial Location (SIL) that you would like to see identified as a site capable of contributing towards OPDC's overall housing supply?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)



Figure 79: Old Oak and Park Royal





# H3: Housing mix

## KEY ISSUES

1. Different households require different types and sizes of housing. A wide choice of housing broadens the appeal of an area to new residents as well as meets the area's housing need. Within Old Oak and Park Royal an appropriate mix of housing across all types and tenures is needed to create balanced and sustainable communities.
2. Delivering a mix of family and non-family sized housing will be important.
3. There will be a challenge in securing appropriate levels of well-designed family accommodation as part of high density development if not carefully planned and located.

## POLICY CONTEXT

### National

7.23 The NPPF requires local planning authorities to plan for the delivery of a wide choice and mix of housing based on evidence. In doing so, local planning authorities will need to identify the size, type, tenure and range of housing that is required including the mix of housing in particular locations and meeting affordable housing needs on site.

### Regional

7.24 The London Plan states that Londoners should have a genuine choice of homes they can afford and which meet their requirements for different sizes and types. The provision of affordable family-sized housing has been specifically identified as a strategic need in London.

## PREFERRED POLICY OPTION

Proposals for new housing developments should deliver a mix of dwelling types and sizes to meet strategic and local need and support the creation of mixed, balanced and sustainable neighbourhoods taking into consideration:

- a. The housing mix and population and household size projections identified in OPDC's draft Strategic Housing Market Assessment (SHMA);
- b. The affordable housing component of developments should aim to achieve the following housing mix:

1 bed flat	2-bed flat	3-bed flat	4-bed flat
22%	24%	36%	17%

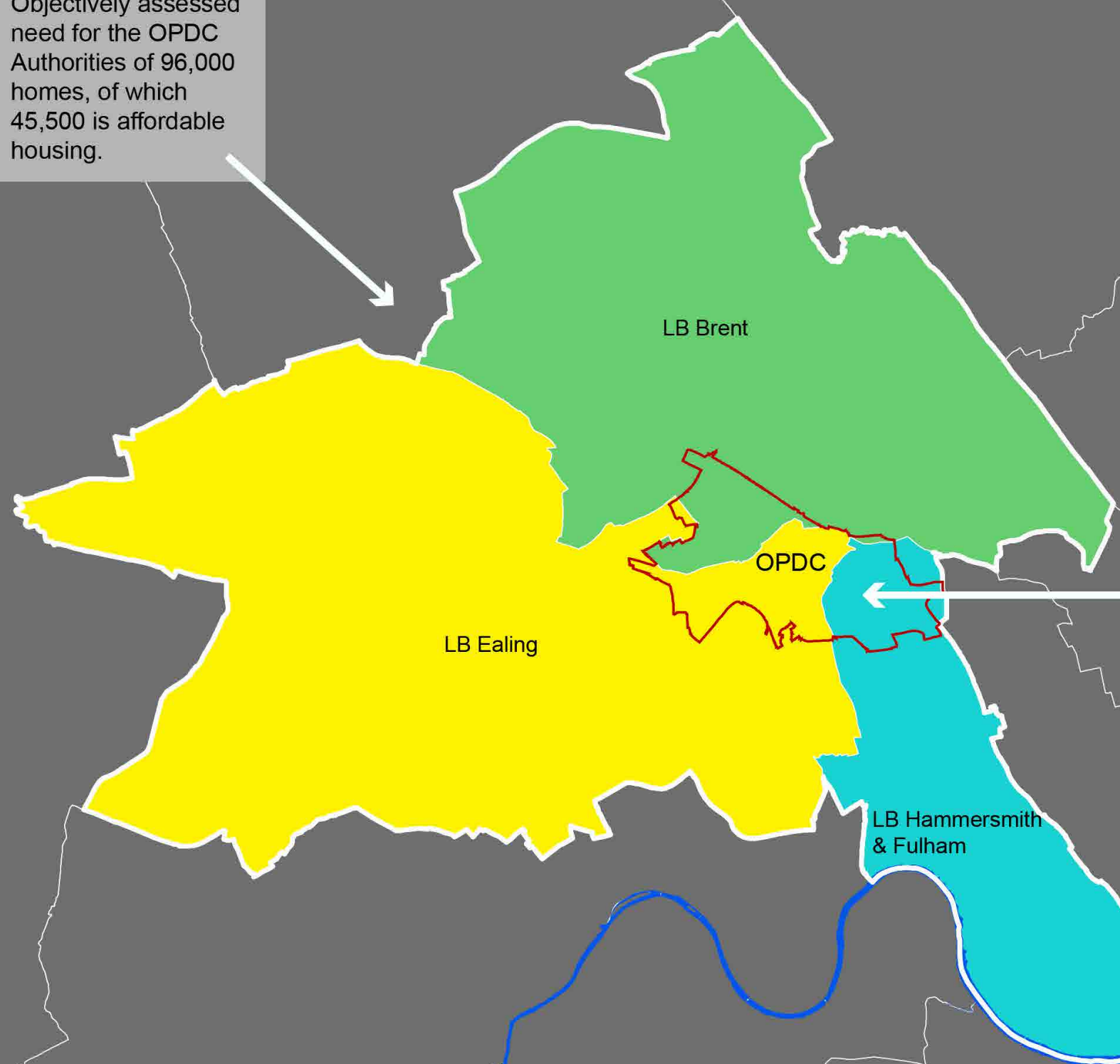
- c. The market housing component of developments should aim to achieve a mix of unit sizes and in particular, family sized housing;
- d. The local character and ability of the site to accommodate a mix of housing types and sizes; and
- e. The design of proposals for new homes to be of the highest quality delivering 'Lifetime Neighbourhoods' and provide 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.

## JUSTIFICATION

7.25 OPDC's draft Strategic Housing Market Assessment (SHMA) provides evidence of local housing need and population and household size projections. When considering proposals for new residential developments, the proposed scheme will be expected to take into account the current SHMA and any other relevant local data. Due regard should be given

Figure 80: Strategic Housing Market Assessment area used to assess need

Objectively assessed need for the OPDC Authorities of 96,000 homes, of which 45,500 is affordable housing.



Objectively assessed need of 1,200 homes, of which 564 are affordable homes.

to the most up to date version of the SHMA to determine the relevant mix.

7.26 The SHMA identifies that the greatest demand is predicted for family sized dwellings across both market and affordable housing. Affordable housing should meet the need identified in the above preferred policy option. For market housing, OPDC's draft SHMA identifies a need for a range of unit sizes and in particular family sized housing. OPDC will encourage early engagement from developers to discuss how market housing provision can help OPDC to meet this need.

7.27 While developments are expected to reflect the identified dwelling mix, rigid application of these may not be appropriate in every case and development proposals are expected to take into account, site viability, location, and other constraints.

7.28 Family sized housing (which the London Plan identifies as having 3 or more bedrooms) is better located on the lower floors of high-density development where it affords better access to courtyards and outside space. In general, OPDC will expect family sized units to be located on lower floors but recognises that certain locations such as town centres or sites adjoining

infrastructure may not be suitable for family sized units on the lower floors. Where family sized units are included in schemes in these locations, they will need to be carefully designed.

7.29 There is a need to ensure that new housing is designed to be readily adaptable and that it will meet the differing and changing needs of households, particularly as the UK's population is growing older. There is also a significant need in London and in the local area for accessible housing across all tenures. To support these demographics and needs changes, OPDC will require that 90 percent of new homes are designed to be accessible and adaptable (Building Regulation M4(2)) and that 10 percent of new homes are fully equipped or adaptable for wheelchair users (Building Regulations M4(3)).

## **ALTERNATIVE POLICY OPTION**

### **1. Allow a proportion of new housing (micro-housing) to not comply with London Plan space standards or Building Regulations M4(2) and M4(3)**

7.30 An alternative option would be to allow a small proportion of new homes to not comply with London Plan space requirements or Building Regulations M4(2) or M4(3). This option would deliver a proportion of micro units (providing less floorspace than the London Plan one person space requirements), which could offer opportunities for lower cost market housing. 'Pocket Homes' provides recent examples of this type of accommodation, having been delivered on a number of sites across London, including locally in Ealing and in Hammersmith and Fulham. However, these new homes would not be designed to meet lifetime needs and would therefore only be appropriate for those people wanting smaller units or those with limited budgets who wanted to live close to central London. However, such small unit sizes could negatively impact on the health and well being of the individual(s).



Figure 81: Adelaide Wharf, Hackney

**Questions:**

**QH3a:** Do you agree with the identified size and mix for affordable housing that should be delivered? If not, what should an alternative mix be and why?

**QH3b:** Should OPDC consider identifying a proportion of housing that does not meet the London Plan space requirements or Building Regulations M4(2) and M4(3)? (see para 7.30 for more information)

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)



# H4: Affordable housing

## KEY ISSUES

1. There is a significant London-wide and local need for affordable housing and an aspiration for Old Oak and Park Royal to contribute to the delivery of these affordable homes.
2. Securing the required levels of affordable housing onsite will be a challenge in the context of infrastructure requirements and viability.
3. Understanding of the long-term implications of the changes to affordable housing (both its definition and funding arrangements) introduced through the Housing and Planning Bill will continue to evolve as the Bill makes its passage through parliament. Through its Local Plan, OPDC will be required to respond to changes once the Bill is enacted.

## POLICY CONTEXT

### National

7.31 The NPPF defines affordable housing as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. To comply with this definition affordable housing should:

- be provided to households whose needs are not met by the market;

- to be provided to eligible households, where eligibility takes into account local incomes and house prices; and
- remain at an affordable price for future eligible households unless the subsidy is recycled for alternative housing provision.

7.32 The NPPF also defines intermediate housing as that which is provided at a cost which is above the income level at which social or affordable rented housing is required and below the entry level for purchasing a home at lower quartile prices on the open market.

7.33 The government's recently announced Starter Homes initiative is the latest addition to the affordable housing product range. The draft Housing and Planning Bill states that proposals for new developments will be required to provide Starter Homes.

### Regional

7.34 London Plan policies relating to affordable housing identify a target of at least 17,000 more affordable homes per year from sites with a capacity for 10 or more homes. These policies also specify that 60% of affordable homes in London should be affordable or social rented, and the remaining 40% should be for intermediate sale or rent.

## POLICY OPTIONS

7.35 There are two key factors that need to be considered when setting an affordable housing policy:

1. What is the objectively assessed housing need i.e. what is the evidence of need for different types of housing in the area and in London as a whole and,
2. How viable is it to deliver affordable housing based on viability assessments.

7.36 As set out in paragraph 7.13, OPDC's draft SHMA identifies an objectively assessed need for 48% affordable housing over the next 20 years. However, OPDC is still developing its evidence base for the viability of affordable housing and it has therefore not been possible to set an affordable housing percentage target as part of this draft Local Plan. OPDC will continue to develop this evidence base over the coming months to inform the affordable housing policy in the next draft Local Plan.

7.37 While the affordable housing policy evidence and detail will develop over time, OPDC considers that a set of clear policy principles should apply to any future affordable housing policy. These are to:

1. Optimise affordable housing provision;
2. Require applicants to sign-up to the Mayoral Concordat, to market new homes in London and the UK at the same time as abroad;
3. Provide on-site affordable housing;
4. Secure a mix of affordable housing for a range of household income levels;
5. Achieve tenure blind developments;
6. Achieve a mix of tenures across all developments; and
7. Agree an approach for establishing nominations rights to the affordable rented housing.

## THE FOUR OPTIONS

7.38 As OPDC's evidence on need and viability continues to emerge, OPDC has been considering four broad approaches that it could take when setting an affordable housing policy for the area. OPDC invites views and comments on which of these potential policy approaches to develop further.

### OPTION 1 - FIXING THE PERCENTAGE

7.39 A single OPDC wide figure is fixed for the level of affordable housing. The Mayor's draft Housing SPG supports this approach in Opportunity Areas. This fixed rate would be subject to a regular review of viability by OPDC and this figure would need to be amended to keep track of market changes. OPDC may also need to consider abnormal costs on specific sites in extreme circumstances and where clearly demonstrated and justified. Comments are invited on whether or not this option should have a review mechanism (please see questions below). The table below sets out the strengths and weaknesses of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>■ Helps provide certainty to developers and land owners about the affordable housing requirements and helps prevent land price rises based on hope value.</li> <li>■ Gives a single definite target and delivers policy compliant levels of affordable housing over the life of a large scheme.</li> <li>■ Easy to define any external subsidy required to deliver this policy requirement.</li> <li>■ Clear definition of obligations where land is sold.</li> <li>■ No need to negotiate on commuted sums as part of negotiations</li> <li>■ Reduces lengthy and costly negotiations with applicants as there would be no need for any detailed viability assessments.</li> </ul>	<ul style="list-style-type: none"> <li>■ The fixed affordable housing level is dependent on the quality of OPDC initial viability work– including estimated costs for abnormals and infrastructure.</li> <li>■ May require a high density to meet identified housing needs.</li> <li>■ Little flexibility to respond to rapid changes in market conditions.</li> <li>■ Could end up with less affordable housing if market performs strongly and if there is no review mechanism.</li> <li>■ Not an approach that has been tried or tested anywhere before.</li> <li>■ The fixed percentage may have to be set at a low rate due to initial viability.</li> <li>■ Would require robust and regular viability analysis by OPDC to ensure conformity with national and regional policies.</li> </ul>



## OPTION 2 – PRODUCT DEPENDENT RANGE

7.40 A percentage range is set for each product type, recognising that some affordable housing products are more costly to deliver than others or are more suited to different types of developments. The table below sets out the strengths and weaknesses of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>■ Innovative.</li> <li>■ Clear minimum/maximum range for negotiations.</li> <li>■ Move away from a hard target.</li> <li>■ Flexible enough to reflect different development types, site economics or local priorities.</li> </ul>	<ul style="list-style-type: none"> <li>■ Complex to negotiate and monitor.</li> <li>■ May not provide a mixed and balanced sustainable community as it could promote developments providing only one affordable tenure type.</li> </ul>

## OPTION 3 – VIABILITY TESTED PERCENTAGE

7.41 This is the approach currently favoured by local planning authorities. A percentage target is set but this target is still subject to viability and each individual scheme would be viability tested to see how much affordable housing it could deliver. The table below sets out the benefits and disbenefits of this option.

Strengths	Weaknesses
<ul style="list-style-type: none"> <li>■ Approach currently adopted by local planning authorities.</li> <li>■ This option has a proven track record of being accepted by Secretary of State.</li> <li>■ Transparency – reliance on published and verifiable data through developers' viability assessments.</li> <li>■ Responsive to market conditions – but also to needs as tenure and product types could flex.</li> <li>■ Responsive to site-specific conditions.</li> </ul>	<ul style="list-style-type: none"> <li>■ Does not control land price rises in the same way as Option 1.</li> <li>■ Could result in the level of affordable housing secured being below the policy target.</li> <li>■ Time consuming and will require costly and protracted negotiations.</li> <li>■ No incentive for developers/ applicants to exceed set target.</li> <li>■ Can have sites where no or little affordable housing is viable.</li> </ul>

## OPTION 4 – NEGOTIATE A TARGET ON SITE-SPECIFIC BASIS

7.42 This seeks the maximum reasonable amount of affordable housing without specifying a percentage target for each development to achieve. A review of relevant economic data at the outset will enable an allocation of affordable housing on the site to be determined.

### Strengths

- No upper thresholds and could secure high levels of affordable housing on certain sites beyond the levels in the London Plan.
- Is a site specific approach.
- A strong audit trail.
- Does not require upfront or comprehensive viability analysis.

### Weaknesses

- Does not provide certainty on the level of affordable housing that will be secured through a development.
- Will not be in compliance with the London Plan or NPPF.
- Is not aspirational.
- Requires long and costly negotiations on each site.
- Relies on verifiable data.

### Questions:

**QH4a:** Do you agree with the affordable housing policy principles that would apply to any of the four affordable housing options?

**QH4b:** Which of the four proposed options do you think would secure the best outcome for meeting affordable housing need? Please explain why.

**QH4c:** Are there any other strengths and weaknesses to the four options that should be included?

**QH4d:** Are there other options that should be considered as a policy option?

**QH4e:** Should option 1 include a review mechanism?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

# H5: Existing housing

## KEY ISSUES

1. There are approximately 2,800 existing homes. While this is a relatively low number given the size of the area, OPDC recognises the importance of the existing housing as providing a suitable supply of homes for the established communities.
2. Long-term empty homes not only impact negatively on their immediate environment, they also remove the potential to use a home in an area.
3. Empty homes are an issue that should be addressed.

## POLICY CONTEXT

### National

7.43 The NPPF states that local planning authorities should identify and bring back into use empty residential housing and buildings in line with local housing and empty homes strategies. Where appropriate, it may use its compulsory purchase powers to achieve this. It states that where there is an additional identified need for housing, planning applications for conversions from commercial to residential use should normally be approved.

### Regional

7.44 Policies in the London Plan specifically

protect residential dwellings and seek to prevent the loss of existing housing numbers, including affordable housing numbers, unless the housing is replaced at existing or higher densities with at least an equivalent floorspace.

## PREFERRED POLICY OPTION

OPDC will seek to optimise the use of existing the housing stock and land through:

- a. Resisting the net loss of existing housing units or floorspace through change of use or redevelopment, except in areas of Strategic Industrial Location (SIL) or where it is being reprovided at a higher density;
- 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 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 amenity space;
- ii. residential conversions maintain the amenity of neighbours, the general character of the surrounding area and do not result in cumulative stress on services; and
- iii. The proposal would not result in adverse impacts on parking and/ or other local amenities.

## JUSTIFICATION

7.45 OPDC will refuse proposals that would result in the net loss of existing levels of housing, except in the areas identified as Strategic Industrial Location (SIL). However, OPDC will allow the loss of existing housing where it is to be replaced by new housing at equivalent or higher density.

7.46 Empty homes can undermine housing supply and negatively impact on adjacent residents and the surrounding area. The longer a dwelling remains empty the more dilapidated it is likely



to become. Once back in use, these dwellings will contribute towards the overall supply of new homes. OPDC will work with the local authorities, landowners and other stakeholders to bring vacant residential buildings back into use. This could include, where necessary, using empty dwelling management orders or compulsory purchase powers (see Delivery and Implementation chapter).

7.47 The OPDC area's existing housing stock is limited but conversions can make a valuable contribution towards delivering new homes and increase the availability of smaller homes. However, the potential cumulative stress from conversions of larger dwellings to smaller homes on both the supply of family sized homes and on on-street parking provision, waste collection and other social amenities needs to be weighed against the wider economic benefits from such conversions and the resultant overall growth in the number of new homes. OPDC will consider these on a case by case basis.

## **ALTERNATIVE POLICY OPTIONS**

### **1. Take a more flexible approach to the loss of existing stock**

7.48 This allows for the loss of existing residential stock for non-residential uses. This may enable greater deliverability of sites; however, proposals resulting in the loss of existing housing without it being replaced could undermine the overall housing supply.

### **2. Allow the conversion of smaller family sized units and not require a proportion of these to be replaced as family homes.**

7.49 Allowing conversions of smaller family sized units without requiring their replacement would increase the overall number of new housing supplied, but it will result in a loss of family sized accommodation.

# H6: Housing in the Private Rented Sector

## KEY ISSUES

1. The private rented sector (PRS) accounts for approximately 25% of London's housing market. The sector helps meet demand for short and long-term housing as well as providing accommodation for households unable to afford to buy their own home or access affordable rented housing.
2. OPDC should consider how PRS can play a role in supporting the overall supply of housing within its area whilst creating a mixed and balanced community.

## POLICY CONTEXT

### National

7.50 The government has promoted growth of a new development sector building homes specifically for private rent.

### Regional

7.51 In providing for a choice of housing, the London Plan provides positive and practical support to sustain the PRS contribution towards increased housing delivery and meeting housing need.

## PREFERRED POLICY OPTION

OPDC will require new purpose built private rented accommodation, in appropriate locations, to:

- a) Meet local and London's strategic private rented housing needs;
- b) Provide an affordable housing contribution;
- c) Provide PRS for a defined period with a review mechanism or in perpetuity; and
- d) Incorporate high standards of design and provide a management strategy, committing to high standards of ongoing management of the premises.

## JUSTIFICATION

7.52 OPDC's draft Strategic Housing Market Assessment identifies the Private Rented Sector (PRS) as making up approximately 30% of the housing tenure across the OPDC's host boroughs (Brent, Ealing and Hammersmith and Fulham). The private rented sector (PRS) plays an

important role in providing homes for those choosing not to, or unable to, buy homes or access affordable housing. It is also an important component in delivering a choice of housing and can play an important role in early delivery and placemaking.

7.53 Historically, private rented homes have often been regarded as badly maintained properties suffering from overcrowding, hazards, poor facilities and insecure tenancies. However, in recent years institutional companies and investors have started to provide large-scale purpose built PRS accommodation, such as at the Olympic Village in Stratford. This accommodation is generally of a much higher standard than the majority of traditional rented accommodation.

7.54 New PRS will need to provide affordable housing. Based on the viability analysis there may be an opportunity to consider the type of affordable PRS product – this could include a proportion as discounted market rent. OPDC will secure a proportion of PRS homes at below

market rates for a specified period or in perpetuity, through covenants, section 106 or other legal agreements, and in line with the affordable housing policy.

7.55 Where discounted market rent is secured as the affordable component of a PRS scheme, we will encourage developers to offer 'deposit savings options' for these tenants whereby the tenant pays into a savings scheme with contributions also provided by the developer. This would enable tenants to save towards a deposit for future homeownership.

7.56 OPDC will encourage the retention of private rented units in perpetuity. Where, this is not the case and PRS schemes are agreed for a defined period, then a review mechanism will be triggered at the point at which the PRS units in a scheme convert to market sale. This review will consider the affordable housing requirements at that time and commuted sums for affordable housing would be made to the local planning authority.

## ALTERNATIVE POLICY OPTION

### 1. Make it mandatory for PRS proposals to sign up to London Rental Scheme (LRS)

7.57 Having landlords sign up to the voluntary London Rental Standard (LRS) can help to ensure a high quality standard of PRS and positively impact on the amenity of neighbouring residents. Making it a mandatory requirement for all PRS proposals to either have in place arrangements/agreements to professionally manage stock will mean an increase in associated costs and could result in some smaller schemes not being delivered.

## Questions:

**QH6a:** Should OPDC seek to have covenants for below market rate purpose built Private Rented Sector accommodation? Please explain why.

**QH6b:** Should all developments for purpose built private rented sector (PRS) be required to sign up to the London Rental Scheme? Please explain why.

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)



# H7: Housing with shared facilities

## KEY ISSUES

1. A house with shared facilities or a house in multiple occupation (HMO) generally refers to a flat or house that is the main resident for three or more occupiers forming two or more households and who share a kitchen, bathroom or toilet.
2. Hostels generally cater for a specific group or groups of occupiers, for example, long or short-term vulnerable residents and homeless persons. Hostels may provide some meals or welfare arrangement to the occupiers and have on site management. They may be provided on a temporary basis, such as winter shelters for the homeless, and by different public bodies or charities.
3. HMOs and hostels contribute to the overall supply of housing and have an important role in helping to meet an area's housing need.
4. They can also adversely impact, especially in high concentration, on the amenity of neighbouring properties if not properly managed and controlled.

## POLICY CONTEXT

### National

7.58 The NPPF states that local planning authorities should deliver a wide choice of

high quality homes and shared houses, either purpose built or otherwise, are an important part of the housing stock. Amendments, in 2010, to the Use Classes Order and the General Permitted Development Order introduced a new class of residential development – C4: Houses in Multiple Occupation (commonly referred to as 'small HMOS'). The Sui Generis HMOs, which existed under the previous legislation, are now commonly referred to as 'large HMOs' and consist of more than six occupants.

### Regional

7.59 The London Plan recognises the strategically important role of HMOs in meeting distinct needs and reducing pressure on other elements of the housing stock.

## PREFERRED POLICY OPTION

Proposals for new purpose built shared housing or for the net loss of the existing shared housing will be considered against the following criteria:

- a. Whether meets identified local need for shared housing;
- b. Whether it complies with any relevant standards, including quality;

- c. Whether it is located in areas with a high public transport access level and facilities and services such as shops, social infrastructure etc.; and
- d. Whether it gives rise to unacceptable impacts on amenity.

## JUSTIFICATION

7.60 Shared housing can play an important role in providing accommodation and meeting the housing need of individuals unable to access self-contained affordable or market rented housing.

7.61 Where HMOs are not carefully managed and if there is an overconcentration of HMOs in a location, they can negatively impact on the amenity of that location. Where evidence suggests this to be the case, OPDC will consider proposals to either improve the accommodation's standard or accept its loss to an alternative housing use.

7.62 New HMOs or hostels should

be located in areas that can absorb the more intensive occupancy rates by individuals living as separate households and sharing a property. In addition, proposals for HMO's or hostels need to be accompanied by information setting out how arrangements will effectively manage the scheme.

#### **ALTERNATIVE POLICY OPTION**

##### **1. Encourage the conversion or loss of shared housing without replacing it.**

7.63 This approach would be more responsive to market needs, but encouraging the loss of shared housing would remove this form of housing from the overall affordable housing supply. This may result in greater pressure on other forms of affordable housing.

# H8: Specialist housing

## KEY ISSUES

1. There is an increasing need for specialist housing for older people and vulnerable people.
2. The scale of regeneration in the OPDC area provides opportunities to meet this need.
3. Providing these types of specialist housing in new high density buildings will require careful planning, design and location to ensure future residents' needs are accounted for and they are integrated into the new development.

## POLICY CONTEXT

### National

7.64 The NPPF identifies the need for local planning authorities to plan for a wide choice of housing, including housing for older people.

### Regional

7.65 Policies in the London Plan require specific account to be taken of the housing needs of older persons in the design of developments and when assessing older people's housing needs. Local planning authorities are required to identify and develop plans and strategies for other supported housing needs. In doing so, the long and short-term

supported housing needs of vulnerable and disadvantaged groups should be assessed.

## PREFERRED POLICY OPTION

- a) OPDC will require an appropriate supply of specialist care and supported needs housing for older people and/or vulnerable people to live as independently as possible.
- b) OPDC will require proposals to be:
  - i. suitable for the intended occupiers in terms of the standard of facilities, the level of independence, the provision of support or care and be accompanied by relevant management policies;
  - ii. of an appropriate mix of sizes to meet needs;
  - iii. of a high design quality, including inclusive design and provision of adequate internal and external space; and
  - iv. accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers.
- c) In the case of market-led development aimed at older people

and/or vulnerable people, particularly where self-contained units are included, contributions to the supply of affordable specialist housing will be required.

## JUSTIFICATION

7.66 The London Strategic Housing Market Assessment 2013 identified a net strategic requirement for between 3,600 and 4,200 new older persons housing units per year between 2015 and 2025. OPDC's draft SHMA identifies that specialist housing needs from the local area (Brent, Ealing and Hammersmith and Fulham) will increase by more than 400 persons per annum over the 20 year period.

7.67 OPDC will support proposals for specialist housing where it contributes to the mix of an area and is delivered through partnerships (arrangements between developer and support service provider) and will have arrangements in place for the long-term management of the development/scheme.



7.68 OPDC will support proposals that enable older people to live in their homes for as long as they want and to then move to supported living when they require greater support to remain independent. Proposals for new older people housing will need to be available at a range of costs to suit a range of financial circumstances. As such developments should contain a proportion of affordable units for older people.

#### **ALTERNATIVE POLICY OPTION**

7.69 No alternative policy option is considered since the proposed policy is consistent with national and regional policy to deliver a wide choice of good quality homes that meet the housing needs of older people and vulnerable people. The NPPF requires local planning authorities to plan for a mix of housing and this policy is in line with this national planning policy.

# H9: Gypsy and Traveller Accommodation

## KEY ISSUES

1. OPDC needs to ensure that it has effective plans to meet the distinct accommodation needs of gypsies and travellers.
2. The authorised site in the London Borough of Ealing falls within OPDC's boundaries and the pitches on it meet the needs of the existing community (shown in figure 82).
3. OPDC will need to plan for the existing pitches located at this site and consider whether there is any additional need for pitches in the OPDC area.

## POLICY CONTEXT

### National

7.70 Planning policy for traveller sites (August 2015) states that local planning authorities should:

- make their own assessment of need (in respect of traveller sites);
- work jointly with other local planning authorities to develop plans through identifying land for sites;
- plan for sites over a reasonable timescale;
- reduce unauthorised developments and encampments and make enforcement more effective;
- ensure that access to education, health, welfare and employment is facilitated by

the provision of suitable accommodation; and

- have due regard to the protection of local amenity and local environment.

### Regional

7.71 The London Plan states that local planning authorities should identify and address the accommodation requirements of gypsies and travellers (including travelling show people).

## PREFERRED POLICY OPTION

- a. OPDC will give careful consideration to the 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);
- b. Where OPDC's Gypsy and Traveller Accommodation Needs Assessment study determines a need for provision of pitches on an additional site OPDC will work with the London Boroughs of Brent, Ealing and Hammersmith

& Fulham to identify a suitable site. Any new sites, pitches and/or plots for travellers should:

- i. Be accessible to transport (including safe access to/from the main road network), services and facilities, and be capable of being supported by the local social infrastructure;
- ii. Be capable of connecting to the utilities infrastructure; and
- iii. Support the health and wellbeing of the occupiers of the site by providing appropriate facilities, layout and design quality.

## JUSTIFICATION

7.72 There is currently one authorised site in the London Borough of Ealing, which falls within OPDC's area. OPDC has commissioned a Gypsy and Traveller Accommodation Needs Assessment in order to provide it with an evidence base. The assessment will identify the need for pitch provision during the plan period and inform the development of a strategy to meet the identified need. As this work is in

progress, outputs from it will inform the next iteration of the draft Local Plan gypsy and traveller accommodation policy.

7.73 Historical data shows a sufficient level of churn at the existing site, which should enable this site to continue to meet any need arising in the short/medium term. Where evidence of additional need emerges, OPDC will work with the three local boroughs to meet the additional identified need and identify a suitable alternative site in line with the requirements of this preferred policy option.

#### **ALTERNATIVE POLICY OPTION**

7.74 No alternative policy option has been considered, as national policy requires local planning authorities to meet the needs of gypsy and travellers within its area as part of its objectively assessed need and 5-year supply

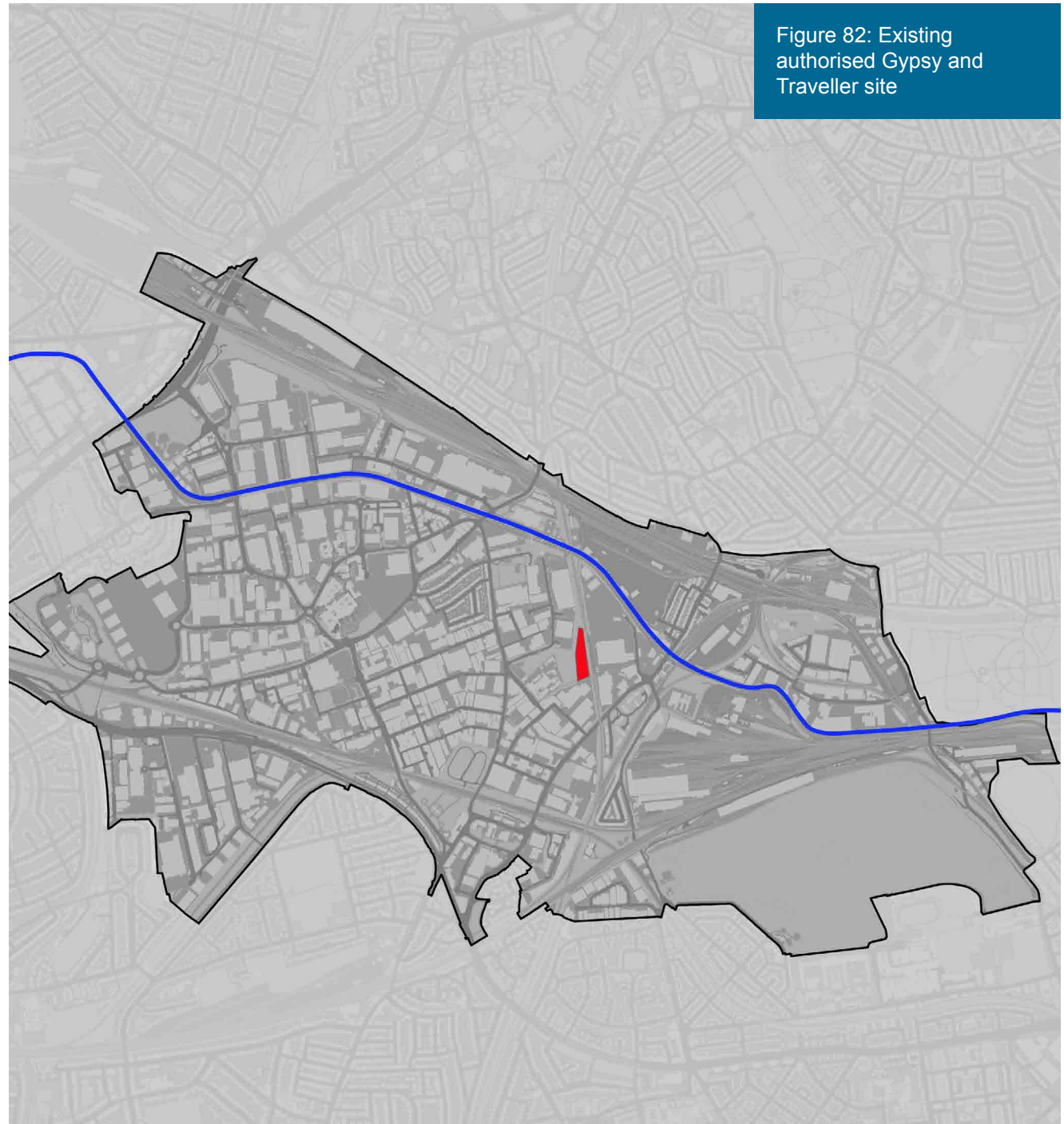


Figure 82: Existing authorised Gypsy and Traveller site



# H10: Student accommodation

## KEY ISSUES

1. London is home to some of the world's finest universities. They are important assets for the city and the UK. Suitable and affordable student accommodation plays a major role in the university experience. Well-designed and purpose built student accommodation, managed effectively and in the right location not only provides a place to live and study but also relieves pressure from the private housing market.
2. OPDC needs to work with these universities, as well as specialist student accommodation providers to support the supply of new well-managed, purpose built student accommodation.

## POLICY CONTEXT

### National

7.75 The NPPF require local planning authorities to plan for a choice of housing, creating sustainable, inclusive and mixed communities.

### Regional

7.76 London Plan policies require local planning authorities to address student accommodation needs.

## PREFERRED POLICY OPTION

- a) Student housing will be supported where it:
  - i. Contributes to the vibrancy and diversity of an area, especially in the early phases of the plan period;
  - ii. Enhances immediate and surrounding areas;
  - iii. Is of the highest design quality;
  - iv. Is located in areas with high PTAL or is easily accessible by non-motorised forms of transport;
  - v. Does not result in a localised over-concentration of student housing; and
  - vi. Results in no net loss of conventional housing supply, especially self-contained homes.
- b) Proposals must include:
  - i. Management and maintenance plans demonstrating how the amenity of neighbouring residents will be protected; and
  - ii. What steps would be taken to minimise impacts on neighbouring uses
- c) Where the proposal is not linked to

a specified educational institution it will need to provide the maximum reasonable amount of affordable student housing.

## JUSTIFICATION

7.77 The Mayor's Academic forum has provided projections for the growth of full time students in London from 2011/12 to 2026/27 and the required additional purpose-built student accommodation that this growth generates. These projections estimate that by 2026/27 London's current student population of just over 365,000 will have increased to between 429,391 and 487,317.

7.78 OPDC recognises the many positive benefits that universities/higher education institutions and their students bring to London. Both enhance an area's reputation as a dynamic and vibrant location, create a critical mass for the delivery of goods, services and events, provide local businesses with skilled workers and seasonal workers and can aid regeneration and investment.

7.79 To achieve mixed and balanced communities, provision of purpose

built student accommodation will be supported but it must not result in an over-concentration in any one particular location. This will avoid issues of:

- not achieving a mix and variety of housing in a location;
- overconcentration of one form of dwelling type;
- directly related noise and management concerns;
- vacant premises at particular times of the year; and
- pressure on the transport infrastructure at particular times of the year (end/start of terms).

7.80 There may be an opportunity to set a quantum of student accommodation that the OPDC area could aspire to deliver (see consultation questions below).

7.81 Proposals for student accommodation will be required to be of high quality in relation to design and size. Student housing schemes, by virtue of providing a number of units of the same size, can result in monotonous façade treatments which can negatively impact on the public realm. Proposals should specifically seek to deliver interesting and high quality facades, that complement the existing and emerging character of the area.

7.82 Student housing proposals should make an appropriate contribution to affordable housing, subject to viability.

7.83 Proposals for student housing should be located in or close to transport nodes so that students can easily access public transport, workplaces and services. Developments located close to transport nodes will also support with the movement of students especially during the start and end of terms.

7.84 OPDC will expect proposals to be accompanied by management plans setting out how any impact on the surrounding area and the amenity of the neighbouring residents will be mitigated. These plans must provide details of the management regime to be implemented on site, from first occupation and on an ongoing basis. Management and maintenance plans should, as a minimum, include detailed information on:

- a. move-in/out arrangements at the start and end of the academic year;
- b. how individual student units will be managed;
- c. how communal facilities, including landscaping, deliveries and collections will be managed;
- d. security and fire safety procedures;

and  
e. procedures for community liaison.

#### Questions:

**QH10a:** Should an area wide student housing target be identified? Please explain why.

**QH10b:** Should OPDC seek to restrict new development of student housing in certain locations? See the place policies for North Acton.

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

### ALTERNATIVE POLICY OPTION

#### 1. Require student housing proposals to be linked to specified educational institutions

7.85 While this may provide the required level of affordable student accommodation and the management policies of the educational institution will ensure that the development is appropriately managed, it may not enable the future flexible use of the accommodation.



