

Old Oak and Park Royal Local Plan examination

Agenda Session 9: Affordable housing

Participants: Inspector, Corporation, Old Oak Park Limited, Grand Union Alliance, HGH consulting (QPR FC and Stadium Capital Developments)

Summary of issues

- 1 Whether the Plan's policies towards the provision of affordable housing would be justified or effective (derived from the twenty-fourth Key Issue of table 5 of Key document 5 identified at Regulation 19(1) stage and the first Key Issue of table 7 of Key document 5 identified at Regulation 19(2) stage and representations 2/H2/2 by GLA, LBBarnet, LBBrent, LBE, LBHarrow, LBHounslow, LB Hillingdon, LBH&F, 2/H2/12 by Sian Berry AM and 2/G/55, 2/H3/1 and 2/G/55 and 2/H3/2 by Old Oak Park Ltd amongst others) in the light of the following points (summarised from representations made at Regulation 19(1) and 19(2) stages);

General

- (a) Welcome the fact that the OPDC Local Plan acknowledges that lack of new housing supply at genuinely affordable levels is a driver of increased levels of homelessness. However, OPDC could do more to maximise the supply of new homes that local people can afford, in particular the homeless.
- (b) No information provided on funding for new homes.
- (c) No clear explanation of the term "affordable homes".
- (d) Need to analyse the number of affordable and family homes that can be provided.
- (e) Include a statement in the Local Plan signalling its intention to encourage delivery of a proportion of a Built to Rent housing for those on the lowest incomes. Built to Rent lets should be on assured (non-shorthold) tenancies to support the creation of lifetime neighbourhoods.
- (f) Affordable housing should be in perpetuity. Policy should set out how loss of existing housing will be resisted and require schemes to reprovide an equal amount of space, rooms and tenure.
- (g) OPDC should look again at how it could encourage innovation in the area of HMOs to make on-site provision of affordable housing. Overcrowded HMOs will be the only affordable option for many residents.

Target

- (h) The plan is not effective because it does not provide evidence or give clarity that balancing priorities and securing infrastructure delivery will actually secure affordable housing, decent places, sustainable community facilities as well as the infrastructure necessary to deliver the plan
- (i) Developers have challenged whether the affordable housing target is feasible given the need to fund employment policies, infrastructure and the challenging local constraints on sites (i.e. contamination). The OPDC's evidence base does not provide evidence to support delivery of a 50% affordable housing target. The Whole Plan Viability Study shows that affordable housing commitments can only be met on some sites and then only on the basis of 30% LAR and 70% intermediate, which does not meet OAN.
- (j) The current uses in the area impact on sales values, meaning there is less money for affordable housing and s106 contributions and that proposals are for higher densities than is acceptable.
- (k) High rise development makes it more challenging to deliver affordable housing. The Mayor's Review of OPDC calls into question how infrastructure will be funded, how levels of affordable housing will be achieved, and can this be achieved at appropriate densities. There is support for the open space target but it may impact on densities and affordable housing provision. There needs to be clear recognition that where major development schemes are required to provide significant new infrastructure this will reduce the amount of affordable housing that can be viably provided.
- (l) The 50% housing target is very ambitious and unrealistic on private land. It would be better for the policy to require schemes to provide different targets for private and public land. The 50% affordable housing target is unjustified; it is clear that infrastructure costs of opening up sites in Old Oak will absorb large proportions of S106 and CIL resources limiting the capacity for affordable housing delivery. Provision of genuinely affordable homes should be prioritised as part of an uplift in values in the area that the transport improvements will generate. 50% affordable housing target is unrealistic when the Mayor is prepared to accept 35% or lower as determined by the threshold approach to viability. Having a threshold approach means that threshold becomes the standard. Developers should be expected to provide more CIL/S106 contributions if that is the case. Concerned that on evidence to date of permissions granted, coupled with Policy H2a) committing to follow Mayoral guidance, suggests that developers will increasingly pursue offers of 35%, with most units at 80% market rent rather than

London Affordable Rent. Recent schemes have not achieved affordable housing levels set out in the Local Plan, and have not provided adequate contributions to infrastructure

- (m) Less affordable housing on one site should only be permissible if an alternative site is providing a higher percentage. Where developers do not achieve a set percentage, they should be asked to produce their detailed costings, which should be scrutinised. OPDC should allow greater flexibility in its policies for housing mix in areas identified for early development opportunities, such as Scrubs Lane.
- (n) The policy gives excessive priority to early implementation which will compromise affordable housing and open space provision.

Tenure mix

- (o) The councils and community groups have also challenged the deliverability of the target, but also consider that the tenure split should require a greater proportion of LAR housing, to align with the need identified in OPDC's Strategic Housing Market Assessment for over 80% LAR. Local communities will not benefit from the affordable housing policy because of the proposed tenure split. The tenure split in Policy H2 does not reflect objectively assessed need as identified in the OPDC SHMA which forecasts an 86% need for London Affordable Rent. Housing must be affordable to local residents, including those on below average incomes and who are in unsatisfactory housing. Need a variety of tenures including genuinely affordable rented accommodation. The proposed tenure split should be changed to 60% London Affordable Rent and 40% Intermediate housing (including London Living Rent and London Shared Ownership) to accord with current London Plan Policy 3.11. There should be tenure mix flexibility as outlined in the SPG (30% LAR, 40% Intermediate, 40% flexible) to allow the Council to adopt the shared equity model as the alternative affordable housing product. Given the fact that only 30% London Affordable Rent will be delivered in OPDC's area, it will put pressure on the neighbouring boroughs to help meet the OAN.
- (p) In section 8.19 it says: "the presence of abnormal site constraints should impact on land values; however, the cost should not necessarily be borne through a reduction in planning obligations." This means that the tenure splits required by the OPDC SHMA can also be achieved without compromising planning obligations. This change to policy 8.19 shows that additional obligations can be achieved without compromising planning requirements. It means the OPDC leadership should be pushing harder to achieve

a tenure split that meets the acute need for social housing in the local area. This can be achieved with lower land values – especially where lower cost public land is being used or is acquired by OPDC. At present, the draft local plan is not “based on a strategy which seeks to meet objectively assessed development and infrastructure requirements,” i.e. it is not prepared positively. Policy 8.19 should be clarified and tenure splits corrected in policy 8.23 to allow the OPDC to meet the objectively assessed development requirements of the OPDC site.

Dwelling mix

- (q) Concerns over lack of commitment to building affordable family home in accordance with the need identified in the Strategic Housing Market Assessment (SHMA). The priority should be for affordable family housing. The policy should be amended to require 51% family sized affordable housing and 64% family market housing as evidenced by the SHMA.

Allocation

- (r) The host borough should receive 100% of the affordable housing nominations for homes in its boundaries.
- (s) Policy should refer to the need for key worker accommodation and Church, community and youth workers should be considered eligible for such accommodation. Provision of key worker housing should be part of policy for housing development in Park Royal Town Centre.

Affordability

- (t) Concerns about the commitment to build genuinely affordable homes.
- (u) Concerns about the affordability of intermediate housing products and whether they will be affordable to local people. High rent affordable housing should not be classed as affordable. Concerns about the affordability of London Living Rent or similar and whether it will be affordable to local people.
- (v) Clarity required on the incomes needed to purchase affordable intermediate homes. Intermediate homes should be affordable to residents earning under £60,000 and be guided by the income thresholds set in the Council’s housing strategy. For intermediate dwellings to be considered affordable, annual housing costs should be no greater than 40% of net household income, where 40% of net income is no greater than 70% of the gross income.

- (w) There is a need for social infrastructure and affordable homes that are genuinely needed not lots of student halls.

The Corporation's response

General

Table 8.2 provides a definition of affordable housing which is in accordance with the definition in the glossary of the National Planning Policy Framework and the definitions and requirements set out in the Mayor of London's Affordable Housing and Viability SPG and Draft London Plan 2017.

The policy has been drafted in accordance with the Mayor of London's Affordable Housing & Viability SPG and Draft New London Plan Policy H7. This specifies that Build to Rent schemes are not required to provide London Affordable Rent housing, i.e.: social rent. This is because Build to Rent providers are not required to be Registered Providers of Social Housing. London Living Rent is the Mayor of London's preferred affordable housing product for schemes under this policy.

As set out in the supporting text and in accordance with the NPPF, Build to Rent affordable units must be retained as affordable units in perpetuity, regardless of whether the separate full market rent units are sold out of the rental market at any point. If private rent units are sold, the sale of the affordable units will only be accepted if it can be fully demonstrated that the units cannot be retained as affordable housing. In such cases the equivalent level of affordable tenure housing should be provided in the vicinity of the site.

The Affordable Housing & Viability SPG and Draft New London Plan 2017 Policy H13 sets out the tenancy requirements: longer tenancies (three years or more), with break clauses that allow the tenant to end the tenancy with a month's notice any time after the first six months. Providers will be required to offer rent certainty for the period of the tenancy, the basis of which should be made clear before a tenancy agreement is signed, including any annual increases which should always be formula-linked. Build to Rent will have to be operated by providers who have a complaints procedure in place and are a member of a recognised ombudsman scheme; and not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

The policy supports the retention of existing high quality HMOs which can provide affordable accommodation for single households. However, as set out in the supporting text, large-scale purpose-built shared housing is unlikely to be available at a price that is affordable for a household with an affordable housing need. However, this can generate a commuted sum to fund additional supply of conventional affordable housing. This policy is in conformity with the Draft London Plan 2017 (Policy H18).

By increasing the housing supply OPDC can help redress the imbalance between housing need and housing supply by providing affordable housing

to meet a range of needs and incomes. The policy supports the retention of existing HMOs meeting the necessary standards and supports the building of new purpose-built shared housing which can generate a commuted sum to fund conventional affordable housing.

Target

The Local Plan is required to be in general conformity with the London Plan. The Draft London Plan 2017 sets a 50% affordable housing target for public sector land, Strategic industrial Location and, Locally Significant Industrial Sites deemed appropriate for alternative use. OPDC has to work in accordance with the requirement set out in the Mayor of London's Affordable Housing and Viability SPG. OPDC has undertaken a Strategic Housing Market Assessment to identify the objectively assessed housing need within the land within the Old Oak and Park Royal red line boundary in accordance with the NPPF. This has indicated a 45% need for affordable housing. The London-wide 2013 SHMA accompanying the current London Plan indicated a 52% affordable housing need city-wide. The Mayor of London has set a strategic target of 50% new homes in London should be affordable as set out in the Affordable Housing and Viability SPG and draft London Plan 2017. In addition, the draft London Plan 2017 sets a 50% target threshold for: public sector land; Strategic Industrial Locations; and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The London Housing Strategy also commits mayoral organisations such as OPDC to 50%. A reduction in this overall strategic target would not be supported by the Mayor and it is therefore not proposed to change this. However, it is recognised in the supporting text that the actual level of affordable housing that is delivered through planning applications will have to be carefully balanced between infrastructure requirements, different tenure types and any public sector support that may be secured. Individual viability assessments will determine the actual amount of affordable housing that can reasonably be secured. OPDC will deliver the Mayor's affordable housing tenures in conformity with Mayoral policy which are London Affordable Rent, London Living Rent and London Shared Ownership. These are defined in policy H2 and table 8.2.

In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs for market and affordable housing in the local housing market area. As set out in the Housing Evidence Statement, according to OPDC's Strategic Housing Market Assessment (SHMA), there is a 45% affordable housing need in the area. As Opportunity Areas, Old Oak and Park Royal can also help to meet city-wide housing need.

An Affordable Housing Viability Assessment 2017 has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure splits: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; and 30% London Affordable

Rent/70% Intermediate is viable on all the site tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. Accordingly, it is considered that this provides evidence to support a 50% affordable housing target for OPDC.

The Whole Plan Viability Study provides detailed modelling of all policy requirements likely to impact on viability and concludes that, in the round, the policies would be viable. None of the viability modelling tests affordable housing grant which can be used on specific schemes to increase the amount of affordable housing towards the 50% target. OPDC will work with landowners, developers and Registered Providers to apply for grant from the Mayor of London's Affordable Homes Programme to increase affordable housing delivery beyond the level that would otherwise be provided without grant. Depending on the funding route, £23k or £43k per additional home beyond the threshold level can be used.

The area has very specific challenges in terms of delivering significant infrastructure. As a successful industrial location, OPDC has high Existing Use Values and that as an area of previous heavy industry, it has relatively high decontamination costs and that consequently, viability is particularly challenging. Existing Use Values (EUVs) range across the site. Some sites have relatively low EUVs whilst others have relatively high EUVs. OPDC considers that EUVs are broadly comparable with many other regeneration sites in London. The EUVs of different sites have been factored into OPDC's viability work supporting the Local Plan - specifically the Affordable Housing Viability Assessment and the Whole Plan Viability Study.

The latest 2017 GLA SHMA published along with the Draft London Plan identifies that London's affordable housing need has increased to 65 per cent because needs have not been met. Therefore a 50 per cent affordable housing target for OPDC is considered to be appropriate for the following reasons: The Draft London Plan 2017 specifies an overarching 50% affordable housing target; including 50 per cent affordable housing for public sector land, Strategic Industrial Locations, and Locally-Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. The Mayor's draft Housing Strategy also sets a target for Mayoral organisations for an average of 50 per cent of homes on land brought forward under the current administration to be affordable.

The strategic policy refers to OPDC's overarching 50% affordable housing target. However, some supporting text has been added to clarify that the quantum of housing enables OPDC to meet its objectively assessed need. Details on housing tenure are contained in Policy H2. Policy H3 provides a balance between delivering 50% affordable housing, family housing requirements as identified in the Strategic Housing Market Assessment and providing appropriate private amenity space in a high density flatted environment.

OPDC is required to be in conformity with the threshold and viability approach outlined in the Mayor of London's Affordable Housing and Viability SPG and draft London Plan 2017. Policy H6 in the draft London

Plan 2017 states that " The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance".

Actual affordable housing delivered through planning applications will need to be carefully balanced between infrastructure requirements, the overall amount of affordable housing and the availability of grant funding OPDC will work with developers, Registered Providers and the GLA to secure funding for new affordable homes and also funding for infrastructure.

Since the publication of the mayoral review, OPDC has been undertaking a series of activities to address the issues raised. OPDC reports to every Board meeting updating on progress against the mayoral review outcomes. OPDC's Local Plan is supported by a Whole Plan Viability Study and Affordable Housing Viability Assessment which assesses the viability of development in planning terms.

OPDC has undertaken an Affordable Housing Viability Assessment (AHVA) which tested and identified achievable affordable housing scenarios. The supporting text to Policy H2 clarifies that on some sites within OPDC, affordable housing targets will be difficult to achieve. This will particularly be the case on sites that require significant infrastructure to unlock development, such as within Old Oak South and Old Oak North. It is clear in the AHVA and in the Local Plan itself that individual sites may require more detailed site and scheme specific viability analysis when they come forward through the development management process. Affordable housing target policies are subject to viability if proposals cannot meet the London Plan requirements.

The Whole Plan Viability Study, included in the evidence base, has assessed all the Local Plan policies to identify those policies likely to impact on development viability, such as affordable housing, infrastructure (including Community Infrastructure Levy), environmental standards, open space requirements and employment policies (including affordable workspace and commercial floorspace at Old Oak Common Station). The conclusion of the Whole Plan Viability Study is that in the round, the policies contained in the Local Plan would be viable.

OPDC recognises in Policy DI1 that not all infrastructure will be funded by Section 106 and CIL contributions and OPDC is proactively looking at alternative funding sources. The policy approach is supported by evidence in OPDC's Environmental Standards Study, which has benchmarked against other developments in London. The requirements for open space will need to be balanced against the requirements for affordable housing, in accordance with policy DI1 and any scheme would be assessed in terms of its impact on amenity and other environmental issues.

OPDC recognises that delivering affordable housing in tall buildings can be challenging and this is reflected in the assessments of different densities within OPDC's Affordable Housing Viability Assessment supporting study. However, OPDC also recognises that affordable housing can be delivered

across a range of building heights subject to addressing relevant challenges.

The appropriate balance needs to be judged on a case by case basis. The Affordable Housing Viability Assessment shows that on some sites with higher values and medium infrastructure requirements, targets will be attainable, but on others that may have lower values, higher infrastructure costs and higher on-site constraints, they will not. This balance or recognition of viability is enshrined in the NPPF and the need for viability to be a factor in affordable housing delivery is recognised in the NPPF, London Plan and in policies SP4 and H2 of OPDC's Local Plan. Policy DI1 sets out that OPDC will pursue many other avenues for the funding of infrastructure than purely S106/CIL and that the expectation is not that development should be funding all the infrastructure required to deliver the spatial vision.

When setting an affordable housing target, it is not necessary to demonstrate that the target can be delivered on all sites. OPDC considers that the assumptions behind the AHVA and Whole Plan Viability Study are appropriate given the strategic nature of the assessment of affordable housing viability undertaken to support the Local Plan and that this assessment accords with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012) and is comparable to other viability assessments undertaken by other Local Planning Authorities in the development of Local Plans. The 30% - 70% split between LAR and intermediate housing does meet OAN. Further detail is set out in OPDC's Housing Evidence Statement supporting study

Tenure mix

In accordance with the London Mayoral policy and/or guidance, affordable housing is required to meet a range of needs of households who cannot afford private housing. This includes London Affordable Rent for households on the lowest incomes who are on a council housing waiting list and have been awarded a reasonable preference (for example: unsatisfactory housing) but also London Living Rent for those on low to medium incomes who are renting privately and wish to save money for a deposit and Shared Ownership. As an extra safeguard, this policy requires developments to include units that are "affordable to households on average incomes in the host local authorities.

OPDC has set the policy in accordance with the Mayor of London's preferred tenures as set out in the Affordable Housing & Viability SPG and Draft London Plan 2017. London Living Rent and Shared Ownership are the Mayor of London's preferred intermediate housing products and meet the requirements in the National Planning Policy Framework and income limits in the draft London Plan. Policy H2 sets an additional safeguard that units must be provided that are affordable to households on average incomes in the local authority area.

The current London Plan contains an affordable housing target split of 60% social/ affordable rent and 40% Intermediate housing; subject to viability, local housing needs and promoting mixed and balanced communities. However, the draft London Plan 2017 contains a target split as follows: 30% low cost rented homes (social rent); 30% intermediate products (London Living Rent and Shared Ownership); and 40% to be determined by the local planning authority (LPA) based on identified need, provided they are consistent with the definition of affordable housing in the NPPF. The proposed tenure split is considered to be positively prepared; justified; effective; and consistent with London and national policy on the following grounds.

The NPPF states that LPAs should set out the strategic priorities for their area which should include strategic policies to deliver (amongst others) "the homes and jobs needed in the area". In accordance with the NPPF and existing planning guidance based on a current population of 7,000 people and 2,800 households, the SHMA identifies an objectively assessed need (OAN) for 1,200 new homes over the Local Plan period (2018 to 2038).

In accordance with the NPPF, the Local Plan needs to meet the full, objectively assessed needs (OAN) for market and affordable housing in the local housing market area. According to OPDC's Strategic Housing Market Assessment (SHMA) and based on the area's current population as is required in the NPPF, there is an objectively assessed need for 1,200 additional homes over the Local Plan period (2018 to 2038). The SHMA has identified an 86% need for London Affordable Rent. Whilst the policy is not directly corresponding in percentage terms, the OAN in terms of tenure split will likely be achieved due to over delivery of housing above the OAN as demonstrated by the Development Capacity Study (2017); which demonstrates that 20,000 homes can be delivered in the local area during the Local Plan period to help meet a wider need across the London Boroughs of Brent, Ealing and Hammersmith & Fulham.

The draft London Plan 2017 sets a strategic target that 50% of all new homes in London should be affordable. An Affordable Housing Viability Assessment (2017) has been undertaken which assessed the viability of delivering 35% and 50% affordable housing by habitable room in the following tenure split: 70% London Affordable Rent/30% Intermediate; 43% London Affordable Rent/57% Intermediate; 30% London Affordable Rent/70% Intermediate. This concluded that: 70% of the affordable housing being London Affordable Rents is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing; 30% London Affordable Rent/70% Intermediate is viable on all the sites tested at 35% affordable housing apart from the site with the highest threshold land value, and on 3 sites at 50% affordable housing. As such, reasonable alternatives to the chosen affordable housing tenure split have been considered. The draft London Plan sets a clear 50% affordable housing target for OPDC, As the majority of sites are public-sector land and/or de-designated Strategic Industrial Location they will have to reach the 50% threshold to benefit from the fast-track route. It is considered to be justified to apply the proposed tenure split given the viability evidence in

relation to the impact of delivery of London Affordable Rent on the overall quantum of affordable homes that may be delivered.

The tenure mix is in conformity with the Affordable Housing and Viability SPG and Draft London Plan 2017. This includes London Affordable Rent (equivalent to social housing at target rent levels), London Living Rent and London Shared Ownership. The Intermediate housing mix may include Shared Equity where it meets the requirements of the NPPF. The affordable housing tenure split that has been chosen has been selected because it is a viable option when compared against other reasonable alternatives which would not be viable. As such its selection ensures the Local Plan is deliverable over its period.

In addition, the affordable housing tenure split that has been chosen accords with the policies of the Draft London Plan 2017 and the NPPF. The SHMA identified a 50% need for family housing. However, the identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and development viability and economics, which shows that SHMA level family housing has an impact on viability. These issues were not considered as part of the SHMA assessment. Given this, 25% family housing is considered an appropriate target but that London Affordable Rent housing does meet its SHMA family housing need. This ensures that the most acute housing need is met. It also helps to ensure that family units are appropriately designed and located with suitable amenity space.

OPDC is required to follow the viability and threshold approach as set out in Mayoral Guidance and in order to help meet the affordable housing needs identified in OPDC's SHMA. The actual affordable tenure that can be delivered on any given scheme is dependent on a number of factors including development viability but also the design of the scheme in terms of separate cores and how different affordable tenures can be managed effectively to keep service charges low, particularly for London Affordable Rent tenants.

Dwelling mix

Housing Mix Policy H3 specifies that developments should deliver a London Affordable Rent housing mix in accordance with OPDC's most up to date Strategic Housing Market Assessment (SHMA). This meets the acute need for London Affordable Rent but also provides some market family and intermediate housing to help meet needs.

The Housing Evidence Statement explains that the identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and development viability and economics, which are not considered as part of the SHMA assessment. Given this, 25% family housing is considered an appropriate target but that London Affordable Rent housing does meet its SHMA family housing need. This ensures that the most acute housing need is met. It also helps to ensure that family units are appropriately designed and located with suitable amenity space.

The Affordable Housing Viability Assessment modelling shows that delivering SHMA levels of family housing has an impact on the viability of delivering 50% affordable housing overall because larger units are worth less per square foot than 1 and 2 bed units. Setting a higher family housing target would also mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.

Allocation

This is not an issue for the Local Plan. OPDC has agreed an affordable housing nominations policy with the London Boroughs of Brent, Ealing and Hammersmith & Fulham.

Affordability

Policy H1 sets out that OPDC will work with developers to ensure that wherever possible homes delivered are marketed to and occupied by people who live and work in London. OPDC also has an Affordable Housing Nominations policy for affordable rented and intermediate homes, that prioritises allocations to local people.

Table 8.2 provides the details of the incomes required for intermediate homes. This is compliant with the income requirements set out in the Affordable Housing & Viability SPG and Draft London Plan 2017.

To ensure the plan is in general conformity with the London Plan, the policy seeks to deliver the Mayor's preferred affordable housing tenures which are London Affordable Rent, London Living Rent and London Shared Ownership. London Living Rent in particular will help households on average income levels to save for a deposit. Key workers would be considered eligible for this type of accommodation. London Living Rent is referred to as part of OPDC's tenure mix in Policy H2 which would apply across the OPDC area.

The Mayor is introducing London Living Rent as an intermediate housing product with sub-market rents on time-limited tenancies, which will help households on average income levels to save for a deposit. Key workers would be considered eligible for this type of accommodation.

London Living Rent is one of three types of affordable homes supported by the Mayor of London, as required by the Affordable Housing & Viability SPG 2017 and Draft New London Plan Policy H7. London Living Rents are for low to middle-income households who now rent privately and want to build up a deposit to buy a home by making savings on their monthly rent. OPDC has agreed a Nominations Policy to ensure that eligible local people are prioritised for London Living Rent homes delivered in the local area.

Policy SP4a)ii) sets out a requirement to deliver 20,100 homes and supports the attainment of 50% affordable housing, subject to viability. This is in conformity with the draft London Plan and is supported by OPDC's Strategic Housing Market Assessment (SHMA) which identifies a need for approximately 50% affordable homes. Policy H2c) and Table 8.2 provide for the delivery of "genuinely" affordable homes that meet the requirements of the National Planning Policy Framework and the draft London Plan.

No change proposed. Policy SP4 provides for the delivery of 50% affordable housing, subject to viability and delivering and/or contributing to new high quality social infrastructure and improving existing. In relation to North Acton, Policy P7c)ii) will deliver appropriate levels of student accommodation in accordance with Policy H10 in that it does not undermine the delivery of conventional housing.

Policy H2c) and Table 8.2 provide for the delivery of "genuinely" affordable homes that meet the requirements of the National Planning Policy Framework and the draft London Plan. 30% of the affordable homes will be provided as low-cost London Affordable Rent (social rent) in accordance with the draft London Plan.

Matters for discussion

- 1) Have I correctly understood the thrust of the representations?
- 2) Is the Plan's policy towards Build for rent justified?
- 3) Ditto policy on HMOs
- 4) Is the target for affordable housing justified?
- 5) Would the policy on tenure split be effective?
- 6) Would the policy on dwelling mix in affordable housing be justified and/or effective

P. W. Clark

Inspector

26.02.19