

Old Oak and Park Royal Local Plan examination

Agenda Session 10: Family housing

Participants: Inspector, Corporation, Grand Union Alliance,

Summary of issues

- 1 Whether the Plan's policies towards the provision of family housing would be justified or effective (derived from the twenty-fifth Key Issue of table 5 of Key document 5 identified at Regulation 19(1) stage and representation 2/H3/1 from Old Oak Park Ltd amongst others). This is based on the following summary of representations made at Regulation 19(1) and 19(2) stages.
 - (a) Developers suggest the target will be challenging to achieve at high densities. Community groups also recognise the challenge of achieving the target at high densities, but want the target increased to 50% family housing to meet needs identified in OPDC's Strategic Housing Market Assessment. Evidence of overcrowding in the SHMA is not being addressed. This could be addressed by delivering more larger family homes as evidenced in the London Assembly Crowded Homes report delivering a downchain to release smaller units for smaller households. Targets should be set for 4 and 5 bed units in accordance with the SHMA need. The 25% family housing target is not appropriate; only 20% on average has been delivered London-wide and the nature and density of development at Old Oak means that units will not have appropriate amenity space. Concerns over lack of commitment to building affordable family home in accordance with the need identified in the Strategic Housing Market Assessment (SHMA). Need to set out how OPDC will work with the boroughs to meet need for family housing. OPDC will not achieve a mix comparable with the surrounding area and may limit the ability of smaller households to grow and remain in the area in the long-term. There is an equalities impact from not delivering more family housing to ease the impact of overcrowding which is more prevalent in BME communities.
 - (b) As set out in policy H12 (Housing size mix) of the draft London Plan, boroughs should not set prescriptive size mix requirements for market and intermediate homes.
 - (c) It would be useful to acknowledge where residential sites are suited to providing commercial use and active frontages at street level, family accommodation will need to be on the upper floors. To have this for 25% of units in a high-density

development is not possible and so the vast majority of family units are likely to be provided in accordance with part b) of this policy.

- (d) Removal of location specific guidance for family and smaller housing is not supported. Text should be reinserted.
- (e) OPDC should allow greater flexibility in its policies for housing mix in areas identified for early development opportunities, such as Scrubs Lane.
- (f) 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.

The Corporation's response

Officers do not propose to increase the family housing target as it is recognised that the target will be challenging to achieve at high densities.

In accordance with the NPPF, objectively assessed need for housing based on households within the redline boundary is set out in the SHMA. 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). Given the overall capacity for homes is much larger, approx. 20,000 homes over the Local Plan period, the objectively assessed family housing requirements based on the existing population can be met, in addition to assisting the London Boroughs of Brent, Ealing and Hammersmith & Fulham to meet their family housing requirements.

Objectively assessed need for affordable housing 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). 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 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.

The SHMA identified a 50% need for family housing. However, 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 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.

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. As explained in the Housing Evidence Statement, the average density of the proposed development is expected to be high density and the built form is expected to be high density blocks of flats (as opposed to houses with gardens) making a 50% family housing target as is needed according to the SHMA undesirable as many units would be unable to access appropriate amenity and play space. The policy and supporting text allows for family housing to be located on other floors with access to secure private and/or communal open 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.

Old Oak and Park Royal are Opportunity Areas in the London Plan. Given the need to optimise development to meet the housing targets, the development will not be of the same built form of the existing housing in the surrounding area. However, it can be complementary and provide a housing mix to meet a range of needs both to newly forming households and established households in the surrounding area who wish to move. Smaller units built can provide opportunities for under-occupying existing households in the surrounding area to down-size thereby providing opportunities for growing families to move up. In addition, the new development can provide new affordable family units.

The policy provides guidance on the design of family housing to ensure that it is appropriately located to be suitable for families with children.

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. It provides a balance between delivering 50% family housing requirements as identified in the Strategic Housing Market Assessment and providing an appropriate design

response for high density family housing. For London Affordable Rent homes, Policy H3 requires the delivery of a SHMA compliant mix. This will mean that the need for four and five bedroom London Affordable Rent homes identified in the SHMA can be met. The 25 per cent over-arching target also allows for larger units to be provided in other tenures but in a way that is sensitive to viability and the nature of the development in the area.

OPDC's SHMA identifies that overcrowding is most significant in the social housing sector and that it has become more significant in the private rented sector in recent years but that levels of overcrowding have been stabilising. By delivering family-sized London Affordable Rent homes in accordance with the SHMA requirements, OPDC can help to address overcrowding in the social housing sector. Delivery of London Living Rent homes can also help address the issue of overcrowding in the private rented sector as there will be an increased supply of affordable homes available for private renters who may otherwise overcrowd. Other policies in this Local Plan, for example, H9, promote the delivery of specialist housing which can free up existing family housing and help alleviate overcrowding.

The Integrated Impact Assessment has identified that the housing policies as a whole will have a positive impact on delivering a mixed and sustainable community.

Matters for discussion

- 1)** Have I correctly understood the thrust of the representations?
- 2)** Are the Plan's policies towards dwelling mix justified?
- 3)** Would the Plan's policies towards dwelling mix be effective?

P. W. Clark

Inspector

26.02.19