

## **Local Plan Independent Examination**

### **OPDC Response to Matter and Issue 10**

**Matter 10: Whether the Plan's policies towards the provision of family housing would be justified or effective (derived from the twenty-fifth Key Issue in table 5 of Key document 5 identified at Regulation 19(1) stage and representation 2/H3/1 from Old Oak Park Ltd amongst others**

**Although I am content with the officers' response to this Matter set out in Appendices E and J to Key document 5, a Hearing session will be required if representors exercise their right to be heard.**

#### **OPDC response:**

- 1.1 OPDC's Strategic Housing Market Assessment (SHMA) (document SD44) has identified that there is a clear need for family sized housing units (3 or more bedrooms) across the affordable (51%) and market (64%) need respectively. This contrasts with actual delivery across tenures in London in the last 10 years which has seen about 20% of all homes being delivered as family units.
- 1.2 Developers have responded to Local Plan consultations to say that a 25% family housing target is too high because of the nature and density of the development.

#### Background for family housing target

- 1.3 The ability for OPDC to set a policy to meet demand for market family housing needs to be considered in the context of OPDC's SHMA (document SD44), Draft New London Plan (document OSD 14) requirements for affordable housing and family housing and the need to take account of viability as set out in NPPF paragraph 173.
- 1.4 The Draft New London Plan (OSD 14) states that boroughs should not set prescriptive size mix requirements for market and intermediate homes. As such, a Local Plan should only set prescriptive targets for London Affordable Rent family housing. However, OPDC Local Plan Policy H3 specifies that developments should deliver a London Affordable Rent housing mix in accordance with OPDC's most up to date SHMA (SD44). This meets the acute need for London Affordable Rent but also provides some market family and intermediate housing to help meet local needs. It provides a balance between delivering 50% family housing in accordance with the need identified in the SHMA (SD44). and providing an appropriate design response for high density family housing.
- 1.6 Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities (see SD43 for discussion on this). These units would unlikely be attractive to families with children.

## Viability of development

- 1.7 The Affordable Housing and Viability Assessment (AHVA, document SD41) tested the impact of delivering different bed size mixes as well as the impact of delivering 50% affordable housing with the following scenarios:
- 1 SHMA mix for all tenures: London Affordable Rent, Intermediate and market meaning 51% family housing overall;
  - 2 20% (as per the average delivery of family housing in London in the past 10 years, see document SD43) for all tenures London Affordable Rent, Intermediate and market; and
  - 3 25% family housing overall to include SHMA (SD44) compliant London Affordable Rent (i.e. 50% three beds plus for London Affordable Rent units), recognising that the market can be incentivised to increase the delivery of family housing above the current 20% pan-London provision.
- 1.8 Of the four different sized bed mixes tested, the most viable is the market delivery of unit sizes across all tenures which generally results in smaller units. The least viable is the delivery of all units at the size requirements set out in the SHMA (SD44) which generally means larger units. A greater emphasis on 1 and 2 beds units increases the overall viability of development as these units usually have a higher value per square foot than family units.
- 1.9 OPDC considers that the 25% family housing target approach provides the following benefits:
- It incentivises the housing market to deliver a minimum level of family housing provision slightly above the London average market delivery to date.
  - It meets the acute need for London Affordable Rent family housing but also provides some market family and intermediate family housing to help meet needs.
  - It helps to ensure that all family units are appropriately designed and located to be suitable for families.
- 1.10 Policy H4(b) permits family housing to be located on other levels than ground and first floor and the Local Plan recognises in paragraph 8.40 that through careful design, open space can be delivered in other ways than gardens at ground floor level. This enables family housing to be delivered on upper floors where there is access to secure private and communal open space that is suitable for children.
- 1.11 To provide clarity on the implementation of Policy H4(a), OPDC proposes to amend Policy H4(a) as follows:
- a) Where it is appropriate family housing should be located **as a priority**:
    - i) at the ground or first floor of developments with direct access to a garden or other secure private and/or communal open space for doorstep play; and
    - ii) close to usable publicly accessible open space and appropriate social infrastructure.
- 1.12 OPDC considers that overall the Draft Local Plan's policies towards the provision of family housing are sound. They take into account the high need for family housing identified in the SHMA (SD44), the historic delivery of family housing in London as a whole, and the proposed high density of development in the area.