

RBKC Core Strategy EIP
Representations to Matter 10: Diversity of Housing
On behalf of Chelsfield (179625)

This Statement follows representations submitted at the Submission Stage of the Core Strategy in December 2009.

The affordable housing requirement is stated in CH2(i) as being at least 50% provision on a gross floorspace in excess of 800sm. Can this requirement be justified in the context of national, PPS3, and London Plan policies?

1.0 Chelsfield's representations

1.1 This Statement follows representations submitted at the Submission Stage of the Core Strategy in December 2009.

1.2 Representations were submitted at this stage stating that revisions to the mechanisms by which affordable housing is calculated were considered necessary to provide consistency with PPS3: Housing (2006) and the London Plan (as amended 2008). It is still considered that the policy as currently drafted is unsound as it is not consistent with National Planning Policy.

1.3 Paragraph 29 of PPS3 states that Local Planning Authorities (LPAs) should set overall targets for affordable housing which should reflect an assessment '*...of the likely economic viability of land for housing..., taking account of risks to delivery and drawing on informed assessment of the likely finance levels available...*'.

1.4 Policy 3A.9 of the London Plan seeks a **target** of 50% of all new housing provisions throughout London to be affordable. The Plan provides for flexibility on the quantum of affordable housing through the provisions of Policy 3A.10 which states the following:

"Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed use schemes, having regard to their affordable housing targets adopted in line with Policy 3A.9, the need to encourage rather than restrain residential development and the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements"

1.5 Paragraph 3.52 of the supporting text to the policy notes that in estimating provision from private residential or mixed-use developments, Boroughs should take account of economic viability and that the '*...development control toolkit developed by the Three Dragons and Nottingham Trent University is one mechanism that will help*'. On this basis the paragraph states that Boroughs

- should ‘...*take account of the individual circumstances in which the site lies, the availability of public subsidy and other scheme requirements*’. Furthermore, the London Plan is clear in stating that determining the affordable housing requirements for a specific site should be approached in the context of Policy 3A.9 (referenced above).
- 1.6 Paragraph 3.57 states that in exceptional cases the required affordable housing may be provided off site, for example, where there are demonstrable benefits to be gained by providing the units in a different location.
 - 1.7 Policy CH2 requires amendment to ensure compliance with national guidance, for example contained in PPS3, and policies contained within the London Plan. This should, in line with the London Plan policy, recognize the exceptional circumstances when off site or no affordable provision would be acceptable.
 - 1.8 The policy should also have regard to the guidance set out in Circular 05/05 with appropriate flexibility to ensure that planning obligations are able to meet the tests set out in paragraph B5 and that there is appropriate scope for negotiation to reflect individual site circumstances as set out in paragraph B10.
 - 1.9 The Core Strategy should therefore reflect the national and London planning policy framework:
 - Affordable housing provision on site should be based upon scheme viability and other considerations in line with the London Plan rather than seek to impose the strategic “target” of 50% on all schemes regardless of individual site circumstances.
 - The proportions of social rented and intermediate should be considered on a site by site basis and should as advocated by Policy 3A.9 of the London Plan should be based on a robust viability assessment.
 - 1.10 Without these changes it is considered that Policy CH2 is, as currently drafted, unsound.

The basis for calculating the requirement for affordable housing is focussed on floorspace rather than number of units. Is the basis for the calculation, and the consequent thresholds, justified by evidence?

2.0 Chelsfield’s representations

- 2.1 The Core Strategy suggests that the requirement to calculate affordable housing based on floorspace is as a result of development coming forward across the Borough. However it does not appear that the Royal Borough has given detailed consideration to the impact this may have on the delivery of affordable housing.

- 2.2 In the absence of any such evidence, it is considered that the calculation of affordable housing should reflect the guidance of the London Plan which calculates affordable housing on the basis of unit numbers or habitable rooms (Policy 3A.11).