

## ANNEX

At this stage the questions are concerned with delivery of the housing target and the affordable housing requirement through the Strategic Site Allocations and the contingency plans to address the 'what if..' situation.

**Spatial Strategy: broad quanta of development:** The housing target set down in the London Plan is to provide 350dpa, whilst the replacement London Plan raises this to 585dpa from the date of adoption (estimated at 2010/2011). The CS indicates that 350dpa will be provided until adoption, whilst making provision from 2011/2012 for a minimum of 600 net additional dwellings per annum. The CS states that the increase can be accommodated because of significant redevelopment sites such as Kensal Green and Earl's Court – designated as Opportunity Areas in the revised London Plan.

PPS3 (para 54) requires sufficient specific deliverable sites to deliver housing within the first five years. Importantly, it states there should be a reasonable prospect that housing will be delivered on the sites within five years ( $350 + 4 \times 600 = 2750$  dwellings). It appears that the Strategy relies on delivery of the Kensal Gasworks site (east & central), Wornington (phase 1), land adjacent to Trellick Tower, parts of the Warwick Road sites, and Lots Road. If development of these sites goes smoothly achieving the 5 year requirement may be possible.

PPS3 also indicates that LPAs should identify a further supply of specific developable sites for years 6 - 10 (para 55). To achieve this it would seem to be necessary to achieve completion on all the Strategic Site Allocations, shown as delivering 5,453 dwellings. PPS3 also indicates that allowances for windfalls should not be included in the first 10 years of land supply unless there is robust evidence of genuine local circumstances, whereas the housing trajectory shows the first five years including a total of 650 dwellings through minor windfalls.

**Affordable Housing:** The affordable housing component is indicated as 90dpa until the revised London Plan is adopted, and then 200dpa. The actual levels of affordable housing are provided where these are known, eg for Lots Road and parts of the Warwick Road allocation, and estimates are provided elsewhere based on a 'needs driven' 50% target.

### Strategic Sites Allocations

**Kensal Gasworks:** The allocation includes upwards of 2,500 new dwellings of which 50% (1,250 dwellings) is estimated to be affordable housing provision. Phase 1 (eastern & central sites) is predicted for completion by 2017 and so would be expected to contribute to the five year supply as well as the affordable housing requirement. A fundamental requirement is the proposed Cross Rail Station which is shown as a 'high risk' component. There appears to be no evidence that funding will be forthcoming and consequently there must be question marks over its delivery. Without this infrastructure the total dwelling number would fall to a maximum of 1,030 for the site – suggesting only 515 affordable

units. The central site is affected by the HSE Consultation Zone for the gasholders and a further 150 dwellings (75 affordable units) cannot be delivered if these are retained. This is identified as a "medium risk".

So far as later phases are concerned there is a "high risk" that the North Pole Depot and National Grid sites will not be delivered reducing the total numbers to 1,030. The potential for bridge links across the railway would also be removed.

### **Earl's Court:**

The Core Strategy indicates that a scheme for the whole Opportunity Area would need to be agreed with the adjacent Borough of Hammersmith and Fulham. The decking over of rail tracks would be expensive and the potential for insufficient funds to tackle the one-way system are seen as possible risks. However, the contribution from this allocation to the housing target and affordable housing appears to be of crucial importance.

### **Questions:**

Can the Council show robust and convincing evidence that sufficient housing, including affordable housing, will be provided within the Strategic Allocations, specifically the Kensal Gasworks and Earl's Court Opportunity Areas to meet the PPS3 and London Plan requirements?

Chapter 39 offers 3 contingency plans for alternative scenarios in the event of any unusual circumstances. Can the Council provide evidence that these would be effective in delivering the level of anticipated development if required?

Is there convincing evidence to support the expected delivery rates shown in the table providing Borough Housing Trajectory Data to 2027-28?