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**LONDON BOROUGH OF  
EALING DEVELOPMENT (OR  
CORE) STRATEGY  
SUBMISSION DEVELOPMENT  
PLAN DOCUMENT –  
INDEPENDENT  
EXAMINATION**

**HEARING SESSION –  
TUESDAY 1 NOVEMBER  
14.00**

**MATTER 2 – VISION AND  
OBJECTIVES**

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Representations  
on behalf of

**Twyford Abbey  
Properties Ltd**

**Personal Identification  
(Representor Number): 5**

**Representation Number: 27**

**October 2011**

Planning • Heritage

Specialist & Independent Advisors to the Property Industry

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## Introduction

1. These representations are made by CgMs Ltd on behalf of Twyford Abbey Properties Ltd and relate to the Inspector's issues and questions in relation to Matter 2 – Vision and Objectives (Chapter 1).
2. Question 1 asks whether the Vision and Strategic Objectives are soundly based and appropriate for the Borough, consistent with national policies and whether they provide a sound basis for the overall spatial strategy and strategic policies in the Core Strategy.
3. Our concern relates to Policy 1.2(a) which states that at least 50% of the housing developed in Ealing up to 2026 will be affordable, as defined in the London Plan. The text to this policy states that a level of 50% affordable housing will be required on all new developments comprising 10 units or more. (our underlining)
4. We do not consider that this policy is consistent with national policies set out in PPS3: Housing and is not consistent with the new affordable housing policies of the London Plan 2011 which are different to those in the London Plan 2008.
5. PPS3 does require Local Planning Authorities to set an overall target for the amount of affordable housing to be provided. However, it states that the target should reflect "*an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing an informal assessment of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured*" (paragraph 29). The Council have provided no evidence to show how the target of 50% affordable housing will be achieved and the rigidity of the policy requiring all sites of over 10 or more units to provide 50% affordable housing does not take account of the economics of delivering affordable housing or the viability of individual schemes.
6. PPS3 (paragraph 29) states that the national indicative minimum site size threshold is 15 dwellings. However, Local Planning Authorities can set lower

minimum thresholds where viable and practicable. This could include setting different site-size thresholds over the plan area. Local Planning authorities will need to undertake an informed assessment of the economic viability of any thresholds and priorities of affordable housing proposed, including their likely impact upon overall levels of housing delivery.

7. The Council's Strategic Housing Market and Needs Assessment 2009 states:

*"13.4.8 The current (now previous) London Plan target of 50% has rarely been achieved across London.*

*13.4.9 The affordability problem of new forming households exists in all regions and targets generally are at 40%. Developers have been able to deliver at this level, subject to the tenure mix balance which is an important factor linked to the overall affordable unit target to be able to achieve site viability.*

*13.4.10 Based on the robust evidence formed in this assessment, the Local Development Framework should consider overall affordable housing target levels of 50% within the Borough, assumed at around 365 units a year.*

*13.4.11 Targets may vary on a site by site basis to take account of land values and development costs, economic viability and wider planning, regeneration and sustainability considerations which will require a flexible approach to specific site negotiation."*

8. Having regard to the above we consider that the overall target for affordable housing should be no greater than 40% and that the policy should be worded in a flexible way to take account of land value and development costs, economic viability and wider planning, regeneration and sustainability considerations.

9. The Council need to consider whether or not it is appropriate to apply lower percentages for smaller sites having regard to the economic viability of smaller

schemes and to consider whether in certain circumstances financial contributions in lieu of on-site provision could be provided.

10. The Core Strategy Policy 1.2(a) also needs to be amended to take account of the changes to the affordable housing policies set out in the London Plan 2011.

### **London Plan (July 2011)**

11. Policy 3.11 of the London Plan, adopted in July 2011 sets out a new strategic affordable housing target of at least 13,200 more affordable homes per year in London over the term of the Plan requiring boroughs to seek to maximise affordable housing provision and to provide separate targets for social rented and intermediate housing to reflect the strategic target of achieving 60% of the affordable housing provision to be for social rent and 40% for intermediate rent or sale. Boroughs through their LDF should set an overall target for the amount of affordable housing provision needed over the plan period with separate targets for social rented and intermediate housing and to reflect the strategic priority accorded to the provision of affordable family housing. Policy 3.11C states that LDF affordable housing targets should take account of the viability of future development, taking into account future resources as far as possible. Policy 3.11D states that affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances, reflecting the borough's contribution towards meeting strategic affordable housing targets and providing a robust basis for implementing these targets through the development control process.
12. In the text to the policy (para 3.64) it is stated "when setting an affordable housing target account must also be taken of the deliverability of these homes." The London Plan strategic target of 13,200 additional affordable homes per annum is based on the funding that was available at that time and the record of delivery of affordable homes over recent years. It is stated that this will be monitored closely in light of changing economic conditions and does not take account of the recent economic downturn or the withdrawal of Government funding for affordable housing through the Homes and Community Agency. There is therefore a strong possibility that the target set in the London Plan may not be achievable and may need to be changed.

13. It is also important to note that the London Policy relating to increasing housing supply (Policy 3.3) sets a target of an annual average of 32,210 net additional homes across London compared to an affordable housing target of 13,200 homes. This amounts to approximately 40% of the provision being affordable compared to the previously adopted London Plan (2008) which set a strategic target of 50% of new dwellings being affordable.
14. It should also be noted that the newly adopted London Plan does not set affordable homes targets for each Borough authority but leaves it for each Borough to set their own targets having regard to local circumstances, the strategic priorities of the London Plan and the ability to deliver affordable housing. The Council have not provided any evidence to demonstrate that their target of 50% affordable housing would be achievable and having regard to the delivery of affordable housing over the last few years we consider that this target is too high and should be reduced.
15. It should also be noted that the London Plan does not state that the LDF affordable housing targets should be applied to all development sites comprising 10 units or more and specifically states that affordable housing targets should take account of the viability of future development. As such we consider that the policy as worded is not consistent with the recently updated London Plan and the requirement that all new development of 10 units or more to provide 50% affordable housing with the strict tenure requirement of 60% social rented and 40% intermediate pays no regard to the need to consider local circumstances or the viability of individual schemes.
16. Having regard to the revised strategic target of the London Plan and the evidence set out in the Council's own SHMNA 2009 we consider the overall target for affordable housing should be no greater than 40%. We have no objection to the threshold for the provision of affordable housing being set at 10 dwellings or more but the amount of affordable housing to be provided in relation to individual schemes should depend on local circumstances and the viability of individual schemes. For smaller developments the requirement to provide 40% affordable housing may not be viable and it may not be possible to provide this on site. Larger schemes are more likely to be able to provide a significant proportion of affordable housing but again provision might vary

having regard to local circumstances, the economics of the development and whether the provision of affordable housing would be contrary to the achievement of other planning objectives for example the development at Twyford Abbey.

17. We consider that the policy is unjustified as it is not based on a robust and credible evidence base. It will be undeliverable and as such not effective and is not consistent with the advice given in PPS3. We therefore consider that this policy does meet the tests of soundness set out in Paragraph 4.52 of PPS12.

### **Recommended Change to Policy and Text**

18. We recommend the following rewording of Policy 1.2(a):

*"Ealing Council will seek at least 40% of the housing developed in Ealing up to 2026 to be affordable housing, as defined in the London Plan, to achieve mixed communities with a range of housing types across the borough and to meet need".*

19. The text to the policy should also be reworded as follows:

*"A level of 40% affordable housing will be sought on all new developments comprising 10 units or more. The Council will seek to achieve a mix of 60% social rented accommodation and 40% for intermediate rent or sale. Priority will also be given to the provision of affordable family housing.*

*In considering the amount of affordable housing to be provided on individual sites account will be taken of land value and development costs, economic viability and any wider planning, regeneration or sustainability considerations with consideration being given to off-site provision or a financial contribution to affordable housing if appropriate."*



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