

Housing Topic Paper

WALTHAM FOREST UNITARY DEVELOPMENT PLAN (UDP) REVIEW

PUBLIC LOCAL INQUIRY 2005

1.0 Introduction

Purpose of the Topic paper

- 1.1 This paper presents background information relevant to the Housing Chapter of the Waltham Forest Unitary Development Plan (UDP). It is intended to bring together relevant sources of information which serve as a background to the UDP Review.
- 1.2 The paper does not seek to respond to any specific objections to the Chapter. The Council's response to each specific objection is considered in the proofs of evidence prepared. In response to specific objections, this topic paper must therefore be read together with the proofs of evidence.

2.0 Planning Policy Context: National & Regional Policy Context

- 2.1 A number of documents provide the basis of the policies set out in the Housing Chapter. These are identified below.

Document	Relevant Paragraph	Issues/comment
PPG1	4 – 7	This paragraph discusses the role of sustainable development in delivering economic development now and in the future securing higher living standards and protecting the environment. Urban regeneration and re-use of previously developed land are considered to be important supporting objectives.
	8 –12	These paragraphs discuss the role of mixed use in creating vitality and diversity whilst reducing the need to travel. It also indicates that development plans should identify individual sites where development should incorporate a mixture of uses.
	13 - 20	These paragraphs discuss the importance of design and urban design in development schemes
	24 – 24	These paragraphs consider key policy objective in respect of supply and location of housing.
PPG3	1 and 2	Sets out the governments priorities in relation to <ul style="list-style-type: none">• the needs of community• choice• priority sources of supply (e.g brownfield land)• sustainable communities

Document	Relevant Paragraph	Issues/comment
		<ul style="list-style-type: none"> • efficient use of land • layouts putting people before traffic • reduced car dependency • good design
	3-7	Providing sufficient housing
	9-11	Mixed communities
	12-13	Assessing local housing needs
	14 – 17	Delivering affordable housing
	22 –23	Re-using urban land and buildings
	24 – 27	Assessing urban housing capacity
	28 – 31	Identifying areas and sites
	32 – 34	Allocating and releasing land for development
	35 – 36	Windfalls
	41	Reusing buildings/conversions
	42	Reallocating employment and other land to housing
	47 –48	Linking development with public transport
	49 –51	Promoting mixed use development
	57 – 58	Making the best use of land
PPG 12	4.13 – 4.16	Social progress which recognises the needs of everyone.
Draft PPS1	1.1 – 1.5	These paragraphs discuss the role planning has in delivering the Government’s wider objectives including the need to achieve balanced housing markets. Sustainable communities need sufficient quality housing to meet the needs of the community.
RPG9	Policy H1	In London provision should be made to accommodate on average an additional 23,000 households yearly
	Policy H4	A range of dwelling types and sizes should be provided, including alternative forms of tenure, in order to meet the needs of all sectors of the community and to plan for balanced communities. Affordable housing should be provided to meet locally assessed need.
	Policy H5	Within the context of urban living, full use should be made the opportunities for increasing housing development within urban areas.

Document	Relevant Paragraph	Issues/comment
Circular 6/98	Introduction	Where there is evidence of need local plans should include a policy for affordable housing.
	5-7	Assessment of need for affordable Housing
	8-14	Affordable housing policies in local plans
	27- 28	Involvement of a registered social landlord

2.2 London Wide Planning Advice

London Plan	Policy Ref/Page	
	3A.1/ P54	Increasing London's supply of housing; maximum provision of 30,000 homes per year from all sources; monitored against a minimum target of 23,000 additional homes per year.
	3A.2 /P55	Borough Housing targets. Waltham Forest target is 9,140 1997 – 2016. Various sources of supply are identified.
	3A.3/pg 58	Efficient use of stock
	3A.4/pg 58	Improving housing choice. New developments should offer a range of housing choices (e.g for older people, students); all new housing built to lifetime homes standards and 10% wheelchair housing.
	3A.6/pg60	Definition of affordable housing to comprise social housing, intermediate housing and, in some cases, low cost market housing.
	3A.7/pg64	Affordable housing targets. UDPs should set an overall affordable housing target for their areas. The Mayor's strategic target is 50 per cent within which a London wide objective of 70% social housing and 30% intermediate provision and the promotion of mixed and balanced communities.
	3A.8/ pg 65	Negotiating affordable housing individual private residential and mixed use schemes.
	3A.10/pg 67	Special needs and specialist housing
	3A.11 /pg 68	London's travellers and gypsies
	3A.12 / pg68	Loss of housing and affordable housing
	5E.1/pg	This is a wide ranging policy for the North London Sub Region which comprises the boroughs of Enfield, Barnet, Waltham Forest and Haringey. Relevant points are: <ul style="list-style-type: none"> To deliver the government's priority for

		<p>capacity for the London – Stansted Cambridge Corridor for development, regeneration and transport improvement;</p> <ul style="list-style-type: none"> • For new jobs and housing opportunities and appropriate mixed use development – Upper Lea Valley Opportunity Area. • maximise the number of additional homes including affordable homes and secure mixed and balanced communities • To plan/secure finance for transport improvements priorities including improved bus services and improved links with Stansted, Stratford and in the longer term Crossrail 2.
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2.3 Mayors Documents

Ref	Document and Title
	SDS Technical Report 23 GLA population and household forecasts Jan 2003
	Supplementary Planning Guidance: Accessible London: achieving an inclusive environment Apr 2004
	Affordable Housing – Draft Supplementary Planning Guidance Jul 2004
	Thresholds for application of affordable housing requirements – Mar 2003
	London's Housing Capacity GLA Sept 2000
	Affordable Housing in London Technical Report 1 Jul 2001
	Planning for London's Growth

3.0 Borough Context

3.1 The following documents prepared by or for the Council are relevant to this Chapter:

Reference:	Document
	London Borough of Waltham Forest Housing Needs Survey Vol 1 and 2 and Executive Summary (Nov 2000)
	London Borough of Waltham Forest Housing Needs Survey Update Apr 2004 [see Summary at Appendix 1)
	Housing Research Reports
	2012 Vision: Waltham Forest Regeneration and Investment Oct 2004

4.0 Review of the UDP

- 4.1 Rather than drawing up a full replacement UDP, this review of the UDP involves making alterations to parts of the existing plan only. The basis for the main changes have been national, regional and strategic planning guidance; the need to take on board more recent studies and to provide to provide clarification where necessary. The Council considers that these changes are necessary to bring the 1996 adopted plan up-to-date.

Issues Paper

- 4.2 In June 2000, the Council published the issues paper “ Housing”. This was intended to offer specialist groups and organisations an early opportunity to comment on the proposals the Council had in mind for the review. This document formed the basis for the changes made to the Chapter.

First Deposit

- 4.3 There were 96 objections to the Housing Chapter (including objections to the Proposals Map). The objections relate to a wide range of policies under this chapter. 6 were later withdrawn. Most objections related to the following policies:
- HSG01 – New Developments Identified Sites
 - HSG04 – Redevelopment of redundant or underused land and buildings
 - HSG05 – Affordable housing

Second Deposit

- 4.4 There were 52 objections to the chapter at 2nd Deposit stage. Most objections related to the same policies identified above.

Pre- Inquiry Changes

- 4.5 There were 19 objections to the Pre Inquiry Changes to the Housing Chapter. Most objections related to HSG05 Affordable Housing.

Key Issues

- 4.6 In terms of key themes emerging from the objections the following are relevant:
- 4.6.1 Insufficient housing allocations

4.6.2 Concerns regarding the robustness of the Housing Needs Survey.

4.6.3 Affordable housing thresholds and percentages not appropriate.

The Council's Response

4.7 It is considered there are sufficient sites identified. In addition to the 29 housing allocation account would also need to be taken of the Mixed Use Regeneration Areas and Major Opportunity Sites which are also expected to yield a significant amount of new housing. Moreover, significant proportions of housing are expected from windfalls and conversions as indicated in the London Housing Capacity Study 2000. Moreover, the Council has commenced assessment of further capacity as part of the Mayors new Housing Capacity Study to inform the Review of the London Plan in 2006. This is already feeding into regeneration work and preliminary studies for the Local Development Framework and is likely to yield further sites for housing and mixed use development.

4.8 The Council wishes the Local Plan Inspector to consider both the 2nd Deposit (Feb 2003) and the Pre Inquiry Changes (June 2004) in respect of affordable housing. The policy for affordable housing is based on an assessment of need originally carried out in 2000 and subsequently updated in 2004¹. This indicated in quantitative terms that there was a level of need for affordable housing that significantly exceeds the capacity of the borough to deliver. This points to a policy seeking the maximum provision of affordable housing from all sources consistent with the objectives of:

- securing mixed and balanced communities,
- protecting the environment
- and ensuring that the target is set at a level which would not present a serious disincentive to housing development.

4.9 The indicative percentage and threshold proposed are considered to be realistic and deliverable and are to be applied flexibly having regard to factors which may affect the economics of provision.

5. Waltham Forest Unitary Development Plan

Changes introduced by the Review are set out in the following table.

REVISED PLAN Policy Numbers	EXISTING PLAN Policy Numbers	NEW POLICY / REVISED POLICY / POLICY UNCHANGED	COMMENTS
HSG 1	HSG 1	POLICY	Policy noting sites to be shown as suitable

¹ Housing Needs Survey 2000 and Housing Needs Survey 2004 by Fordham Research Ltd.

REVISED PLAN Policy Numbers	EXISTING PLAN Policy Numbers	NEW POLICY / REVISED POLICY / POLICY UNCHANGED	COMMENTS
		UNCHANGED	for housing development on the UDP Proposals Map. New sites shown on proposals map at 2nd Deposit stage.
HSG 2	HSG 2	POLICY UNCHANGED	Proposals involving net losses of residential land / buildings will be resisted.
HSG 3		NEW POLICY	Encourages well-designed mixed use schemes incorporating housing elements - in accordance with Government planning guidance.
HSG 4	HSG 3	REVISED POLICY	Policy seeking to maximise the amount of land in residential use as before. It further seeks the most efficient use of land subject to this being within the capacity of existing infrastructure. The policy was the subject of Pre Inquiry Change PIC 3.6 cross referencing to a revised Policy PSC4 relating to residential density.
HSG 5	HSG 4 / 5	REVISED POLICIES	An overall target of 35% was proposed in 2nd Deposit. This was subsequently the subject of Pre Inquiry Changes. A borough wide target of 50% affordable housing from all sources was proposed. Moreover, Pre Inquiry Changes proposed that affordable housing should be sought on all sites with 15 or more units proposed - a minimum proportion of 40% should be affordable homes.
HSG 6	HSG 15	REVISED POLICY	Revised policy - emphasis changed now that construction work is winding down on the main Housing Action Trust estates. Objective is now to engage residential social landlords in the provision of further social housing in the borough.
HSG 7	HSG 6	POLICY UNCHANGED	Policy seeking an adequate mix of different types of housing in the borough.
HSG 8	HSG 7	REVISED POLICY	Policy seeking housing for people with disabilities. Pre- Inquiry Changes follow Mayors policy of seeking to ensure 10% wheelchair housing and all homes built to lifetime homes standards.
HSG 9	HSG 8	REVISED POLICY	Policy on housing for people (formerly `with specialised` needs now retitled) `requiring an element of care` amended to emphasise that it should be located convenient for transport, shopping &

REVISED PLAN Policy Numbers	EXISTING PLAN Policy Numbers	NEW POLICY / REVISED POLICY / POLICY UNCHANGED	COMMENTS
			other facilities.
HSG 10	HSG 9	REVISED POLICY	Policy on dwelling conversions amended to emphasise value as source of additional housing for smaller households.
HSG 11		NEW POLICY	Policy on hostels and other temporary housing accommodation introduced in view of the recent demand for such accommodation in the borough.
HSG 12	HSG 16	REVISED POLICY	Policy on travellers' sites amended to emphasise that Council will consider their needs with respect to a range of services.

Appendix One

Housing Needs Survey Update - Summary

[Extract comprising the Summary from Housing Needs Survey Update - Fordham Research Ltd April 2004]

This report provides an update to the 2000 Housing Needs Survey (HNS) conducted on behalf of the London Borough of Waltham Forest by *Fordham Research*. The main purpose of the update was to revise estimates of the need for affordable housing as new information has become available. The main changes made were:

1. To take account of methodological changes that have been made by *Fordham Research* since the original report due to publication of 'Local Housing Needs Assessment: A Guide to Good Practice' (ODPM 2000)
2. To take account of changes in the housing market (i.e. changes in prices/rents)
3. To take account of changes in the supply of affordable housing
4. A rebasing of base figures to take account of information from the 2001 Census and also H.I.P. data

In addition the opportunity was taken to look in detail at certain aspects of analysis which have become more prominent in recent housing needs surveys, this includes:

1. A more detailed look at the potential role of different 'intermediate' housing options to meet housing needs (intermediate housing including low-cost market housing, shared ownership and discounted market rent)
2. A 'Balancing Housing Markets' exercise which looks at demands and affordability across all tenures (i.e. not just affordable housing)

Following the ODPM Guide model, this HNS Update estimated that an additional 2,972 additional affordable homes per annum would be needed over the next five years in order to meet the total current housing need in Waltham Forest. The equivalent figure in the 2000 report was 1,812 additional affordable homes per annum. The difference between the two figures is likely to in part relate to small methodological differences, as well as actual growth in housing need due to changes in the Borough's demographic profile.

The level of need shown through this assessment is significant and it would thus seem reasonable to assume that the Council would want to secure affordable housing wherever possible. The implications for policy are therefore that any percentage target level and the lower government recommendations for site size thresholds would be justified.

Analysis of the updated survey data allowed consideration of whether households in need could afford 'intermediate' housing, defined as any housing with outgoing costs between social rents and the minimum cost of (second hand) market housing. Results suggest that around 32.4% of households in need could afford intermediate housing. However, it is important to note that the majority of those 32.4% could only afford intermediate housing that was closer to the cost of social rented than to the cost of minimum market priced properties.

This Update finished with a Balancing Housing Market (BHM) assessment of the data. A BHM assessment considers the extent to which the Borough's housing market is approaching 'balance' through analysing supply against demand across all tenures and property sizes. This exercise confirmed a significant need for additional affordable homes, within all size categories, in Waltham Forest. It also showed a small shortfall of owner occupied properties, particularly of one and four bedroom properties and a surplus of all sized of private rented accommodation.