



MATTER 3: MEETING THE BOROUGH'S HOUSING NEEDS

Question 2 (a): Is Policy HOU01 sufficiently clear and in general conformity with the strategic target and approaches set out in Policies H4 and H5 of the London Plan?

We do not consider that our representations at Regulation 19 stage in relation to the lack of clarity of the status of Affordable Rent has been sufficiently addressed. We accept that Affordable Housing has been defined in the glossary, but para. 5.5.11 of the supporting text still refers to Affordable Rent as a form of intermediate housing. This is inconsistent with the wording of Policy HOU01, which defines Affordable Rent (correctly) as a low-cost rent product and not an intermediate product. We request that para. 5.5.11 is amended to provide the necessary clarity.

Question 2 (j): Are the other proposed modifications to Policy HOU01 and its supporting text necessary for soundness and would any further changes be needed to provide specific requirements or approaches relating to First Homes, Starter Homes or Build to Rent?

Para. 5.2.4 refers to the delivery of *'a range of affordable homes including First Homes delivered on all major schemes.'* However, the Plan provides no further clarity or detail on the Council's position in respect of discount levels and affordability. The Council's schedule of responses to representations received at Regulation 19 stage (EXAM 1K) states, in response, that *'the Council's position on First Homes will be determined by the forthcoming Housing Strategy. This position is expected to be set out in a Proposed Modification to the Local Plan.'* However, no such modification is proposed in the Table of Council's Proposed Modifications.

We consider that the Plan requires a clearer approach to First Homes in accordance with the National Planning Policy Framework and the Written Ministerial Statement setting out policy on First Homes, which came into effect in June 2021.

The affordable housing requirements for Build to Rent specifically are set out in Policy HOU06 (our comments on Policy HOU06 are set out below). We consider that a sentence confirming the approach to affordable housing requirements for Build to Rent development is also set out in Policy HOU01, for consistency.

A proposed modification (MM126) has confirmed that more than one BtR development will be supported at Brent Cross. We strongly support this change, but question the insertion of the word *'generally'*, which is not necessary and adds uncertainty. This word should be removed so that unambiguous policy support is provided for BtR development in principle within the Brent Cross Growth Area (which we consider should be coupled with the explicit mention of BtR development in Policy GSS02, as set out above).

Question 3 (d): Whether the overall approach in Policy HOU02 in terms of housing mix provides an appropriate and effective level of flexibility to enable an efficient and effective use of land, whilst ensuring that identified housing needs would be met?

As set out in our representations at Regulation 19 stage, if Brent Cross Growth Area is to meet the delivery timescales set out in the Plan it will need to include a range of residential types and products, especially BtR. We therefore welcome the statement within the Plan that BtR development will be supported within the Brent Cross Growth Area (as above). However, the same Plan also sets out what we consider to be an unambiguous position on the provision of 1-bedroom units, which means it fails overall to provide the policy context within which successful BtR development can be delivered.

The London Plan provides that Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes. The Mayor's Affordable Housing and Viability SPD states, in para. 4.31 (our emphasis):

*“Build to Rent can be particularly suited to higher density development within or on the edge of town centres or near transport nodes. **Local policies requiring a range of unit sizes should be applied flexibly to Build to Rent schemes** in these locations to reflect demand for new rental stock, which is much greater for one and two beds than in owner-occupied or social/affordable rented sector. In addition **LPAs should take account of the distinct economics of Build to Rent**, where potential yields and investment risk can be affected by increases in the number of large units within a scheme.”*

The Council considers, in its schedule of responses, that it has taken a proportionate response to BtR, and points out that the housing mix policies ‘reflects priorities identified through the SHMA rather than prescriptive requirements.’ However, the wording of the policy does not reflect this. To the contrary, it states that innovative housing products (which presumably includes BtR) will be supported ‘if they meet the requirements of this Policy.’ By inference, if they do not meet the requirements of the policy, they will not be supported. We consider that BtR developments will struggle to achieve anything remotely near the preferred dwelling mix in Policy HOU2.

As set out in our letter of 09 August 2021, the Plan should be clearer that policies on housing mix will be applied flexibly to BtR schemes in accessible locations like Opportunity Areas and/or Growth Areas (or, if considered necessary, specifically the Brent Cross Growth Area). This will enable a more permissive approach to BtR without jeopardising the ability of the Local Planning Authority to refuse ‘traditional’ housing schemes on the basis of an inappropriate housing mix. As presently worded, we do not consider that the Plan as drafted takes a ‘positive’ approach to the BtR sector and is therefore not in conformity with the London Plan, and is neither effective nor deliverable.

Question 9: Is the approach of Policy HOU06 to meeting other housing needs, such as Build to Rent, and self-build and custom housebuilding, sound and in general conformity with the London Plan?

There is an error in Policy HOU06 in that it refers to Policy H13 of the London Plan (it should read Policy H11).