



LONDON BOROUGH OF TOWER HAMLETS LOCAL PLAN: HEARING STATEMENT

ONE HOUSING GROUP

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1 Introduction

- 1.1 This Hearing Statement is submitted by Quod on behalf of One Housing Group (OHG) ahead of the forthcoming Examination of the London Borough of Tower Hamlets Local Plan.
- 1.2 OHG is a not-for-profit housing association that owns and manages over 15,000 homes across England and the south east, including over 5,000 homes in the London Borough of Tower Hamlets (LBTH). This Hearing Statement relates to all of OHG's estates in the Isle of Dogs: Barkantine, Kingsbridge, St John's and Samuda. OHG have previously submitted representations to both the Regulation 18 and Regulation 19 consultations, in December 2016 and November 2017 respectively (see Appendices 1 and 2).
- 1.3 OHG is currently in the process of consulting with its residents on the issues facing the four estates and the most appropriate way of addressing them. The estates face issues including pressure on local infrastructure, overcrowding, lack of affordable homes for future generations and issues with building quality that are challenging to address. Options for dealing with these issues might range from replacement housing, refurbishment or renewal. Further consultation is required but whatever options emerge it is vitally important that the Local Plan provides the flexibility and a clear framework for delivery.
- 1.4 This Hearing Statement addresses some of the issues raised by the Inspector in the *Schedule of Matters and Issues for the Examination*. Specifically, the Statement addresses the following matters:
 - Matter 5 – Housing.
 - Matter 6 – Local housing need.
 - Matter 8 – Heritage, design and tall buildings.
- 1.5 These matters are addressed individually in the next section.

2 Comment on Relevant Matters

Matter 8: Heritage, design and tall buildings

2.1 The issue of tall buildings is relevant to the matter of housing delivery, and so we address this issue first.

2.2 The Inspector raises the following issue:

Issue 8 – Does the LP take a justified and suitable evidence based approach to heritage, design and tall buildings? Is the LP consistent with national policy in relation to these matters and will it be effective in implementation?

2.3 As set out in OHG’s representations to the Regulation 19 consultation, it is OHG’s view that Policy D.DH6 is neither justified nor effective.

2.4 The draft Tall Buildings Study (July 2017) included a Tall Building Zone for the Millwall Inner Dock Cluster, extending from Westferry Road in the west to Manchester Road in the east. The study recognised that the height of tall buildings should drop away from the centre of the cluster to the periphery to avoid creating a wall of development at the perimeter (in this case the River Thames). The extent of the Tall Building Zone at the Millwall Inner Dock Cluster was consistent with that approach. However, the final version of the Tall Buildings Study (February 2018) reduced the size of the Tall Building Zone to exclude the estates managed by OHG, together with some surrounding properties (see Figures 2.1 and 2.2, below). This significant change was not explained nor justified. The change is illogical when considered against the principle of declining height from the centre of the cluster, as set out above. OHG’s land holdings will, under the proposed approach, be surrounded on three sides by tall buildings, rather than being part of a gradual decrease in height extending from Canary Wharf to Millwall Outer Dock. This is contrary to the principles set out in the Tall Buildings Study.

2.5 Such an approach brings into question the effectiveness of the policy as it will not be in conformity with the London Plan, paragraph 7.27 of which states:

“...ideally, tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area.”

2.6 Policy 7.7 part A requires tall buildings to be part of a plan-led approach that identifies areas that are appropriate for such development and areas that are inappropriate. The Tall Buildings Study offers no justification for considering the land around the OHG estates as appropriate for tall buildings but the OHG land as inappropriate. Policy D.DH6 is therefore not in conformity with the London Plan.

2.7 The draft New London Plan also requires account to be taken of the potential for new homes, economic growth and regeneration in the identification of sites suitable for tall buildings¹. Reinstating the Tall Building Zone to its full extent would potentially allow for an increased number of homes within walking and cycling distance of Canary Wharf. This would help to realise Canary Wharf’s future economic potential without adding unnecessary pressure to the capacity of the public transport network (recognised by the Local Plan as already being under pressure). The potential to construct tall buildings also increases the options for estate regeneration. Finally, planned improvements to the Docklands Light Railway will increase public transport capacity in this part of the Isle of Dogs, thereby increasing development potential and making the

¹ Policy D8 Tall Buildings (part B Tall building locations)

area even more suitable for tall buildings. The Tall Buildings Study fails to take account of any of these matters in the case of the OHG estates. It is therefore not justified nor effective.

Figure 2:1 – Tall Building Zone – July 2017

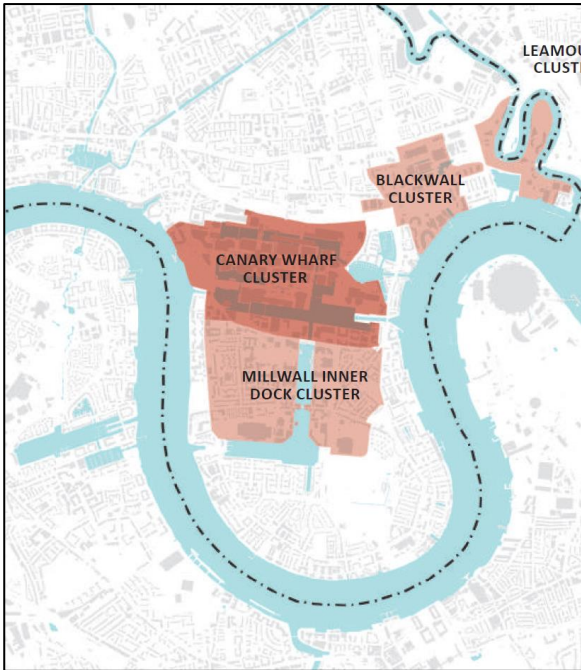
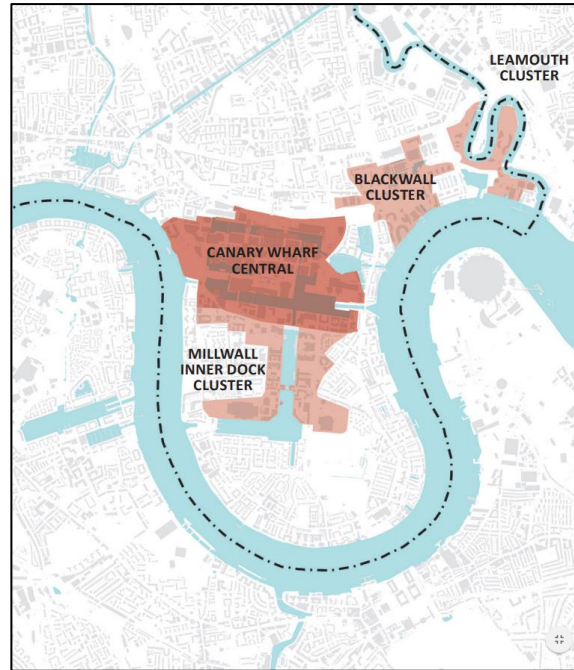


Figure 2:2 - Tall Building Zone – February 2018



Matter 5: Housing

2.8 The Inspector has asked the following general question regarding housing:

Issue 5 - Is the level of housing required deliverable?

2.9 With specific regard to overall delivery, the following further questions have been raised:

Overall delivery over the plan period

5.1 *Policy S.H1 advises that the LP will secure the delivery of 58,965 homes across the borough between 2016 and 2031. This equates to 3931 homes per year. I understand this has been calculated by 'rolling forward' the annual target identified by the London plan. Is this approach justified?*

5.2 *Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates?*

5.3 *The LP acknowledges that there will be a shortfall in the housing delivery towards the end of the plan period. Chapter 6, para 6.4 (page 265) advises the Council will explore ways of addressing this shortfall during the plan period:*

- *What specific measures are the Council proposing the deal with this issue?*
- *Why has the Council not identified sufficient sites for the plan period?*

- 2.10 OHG supports the intention of Policy S.H1 to meet the housing target for LBTH set by the London Plan (at least 3,931 new homes per year).
- 2.11 However, there remains a shortfall of 4,510 dwellings at the end of the plan period. Paragraph 4.8 of the draft Local Plan commits LBTH to *“working with our partners (including the Greater London Authority) to maximise housing supply within the parameters of sustainable development and address this unmet need.”* This vague statement is no commitment at all and offers no assurance that the full objectively assessed need will be met. The Local Plan cannot be considered effective nor positively prepared if there is a reasonable prospect that it will fail to meet the minimum target set out in the London Plan, which is based in part on the London Strategic Housing Market Assessment (SHMA) (2013).
- 2.12 OHG’s view is that a greater commitment to meeting need could be made simply by reinstating the Tall Building Zone in Policy D.DH6 to the full extent set out in the draft Tall Buildings Study (see previous section). Both the old and new versions of the NPPF place great emphasis on deliverability and this would be a simple and effective way of increasing the capacity for more housing and boosting housing supply. The absence of any justification for the reduction in size of the Tall Buildings Zone must be addressed if the Inspector’s questions at 5.3 are to be answered.

Matter 6: Local housing need

- 2.13 The Inspector has asked the following question regarding local housing need:

Issue 6 – Will the LP be effective in delivering the appropriate type of housing to meet the needs of the borough?

- 2.14 OHG commented extensively on this matter in their representations to the Regulation 19 consultation. Matters supported included the following:
- OHG is supportive of Policy S.H1 (Part 2) which requires a minimum of 35% affordable housing on sites providing 11 or more new residential units (subject to viability).
 - OHG supports the principle in Policy D.H2 that affordable housing should include a range of tenures and that re-provided units within estate regeneration development schemes should have the same or equivalent rent levels.
- 2.15 However, OHG does not support the approach to housing mix set out in Policy D.H3 (Part 3), for the following reasons:
- The mix set out differs significantly from the previous draft of the Local Plan, mainly due to methodology used in the 2017 LBTH Strategic Housing Market Assessment (SHMA). The methodology used is described as a “National Methodology”, whereas previously, the methodology complied with the London Plan SHMA (GLA, 2013). The new methodology is unclear and poorly explained making the proposed housing mix unreliable and not justified.
 - The proposed unit mix for intermediate housing is not achievable having regard to the affordability constraints associated with shared ownership and intermediate rent products. Both would need to be discounted if they are to align with the affordable rent tenure types also proposed.
 - The SHMA methodology for calculating affordable housing need is restricted to those in receipt of housing benefit. This is contrary to the NPPF definition of affordable housing (both the 2012 and

2018 versions) which includes any household whose needs are not met by the market. The LBTH methodology excludes those households that are ineligible for housing benefit because they are living with a family member or those with savings of over £16,000. Policy D.H2 (Part 3) is therefore inconsistent with national policy and not justified.

- With reference to the Inspector's question 6.2, OHG does not consider Policy D.H2 to be sufficiently flexible. If a housing mix is to be included, it must be worded to provide sufficient flexibility to account for site-specific circumstances and market conditions.
- Part 5 of Policy D.H2 is inconsistent with Policy 3.14 of the London Plan. The former states that estate regeneration schemes should "protect the existing quantum of affordable and family units" whereas the latter states that the "loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace." The London Plan is therefore more permissive of redevelopment in the right circumstances. OHG supports the principle of providing residents with the opportunity to remain in their immediate area, especially families, but this inconsistency makes the policy ineffective.

3 Summary

- 3.1 OHG is in the process of considering how best to meet the future needs of its residents on the four estates on the Isle of Dogs, in partnership with the residents. The outcome of that approach has yet to be determined, which means flexibility is required on the part of the Local Plan to accommodate a range of options. Whatever form the proposals ultimately take, a sound and up-to-date Local Plan will be key to its delivery. At present parts of the Local Plan are not justified and are inconsistent with national policy and the London Plan.