

## Examination of the London Borough of Tower Hamlets Local Plan

### Schedule of Matters and Issues for the Examination

#### Matter 6, Issue 6

Representor ID: 624580/Canary Wharf Group Plc

27 July 2018

#### Hearing Statement on behalf of Canary Wharf Group Plc ("CWG")

#### **Matter 6: Local Housing need – including Affordable Housing and Student Housing**

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

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#### **6.1 Has the affordable housing target identified by policy SH.1 been calculated in accordance with policy 3.11 of the London Plan and is the approach sound?**

1. CWG consider that based on our experience as well as concerns we have regarding viability assumptions (set out in hearing statement Matter 3) there is a risk that the target set out in draft policy SH.1 is not deliverable and therefore unsound. We do not consider that policy 3.11 part f of the adopted London Plan, specifically the viability of future development, has been fully considered or robustly evidenced.

#### **6.2 Is policy D.H2 justified by the evidence base? Is the policy sufficiently flexible? Is the threshold level set for affordable housing deliverable? Is part 5(c) as drafted justified and effective?**

2. CWG do not consider that draft policy D.H2 (page 68) is fully justified by the evidence in particular the bedroom unit mix is overly prescriptive and goes against the draft London Plan requirements in Policy H12 part c. CWG consider that the current mix is not feasible in the view of the wider restrictions that are often imposed having regard to affordability i.e. income caps. CWG also consider the policy to not be deliverable against market demand and affordability.
3. CWG consider that the 35% threshold approach and overall 50% affordable housing target, whilst consistent with the adopted GLA Viability SPG and LBTH Viability SPG, is undeliverable on a number of sites as set out in the Hearing Statement to Matter 3. Site specific viability assessments should still be considered in accordance with current policy requirements.

#### **How does the proposed tenure split of 70% rent and 30% intermediate relate to the London Plan proposed tenure split of 60% and 40%? Is this approach sufficiently flexible, justified and consistent with national policy?**

4. CWG consider that the tenure split isn't justified against the current adopted London Plan and isn't sufficiently flexible to accommodate the GLA Viability SPG and draft London Plan in respect

of tenure mix and affordability. (30/30/40). The tenure split should be flexible to meet individual site circumstances and constraints.

5. Furthermore the draft Local Plan and supporting evidence base does not take into consideration the Build to Rent sector or the impact this product has on scheme viability including affordable housing. This tenure type is widely supported nationally (newly adopted NPPF) and regionally, and there is currently no flexibility in place within the Local Plan to support this.