



**LEE VALLEY REGIONAL PARK AUTHORITY**

**REGENERATION AND PLANNING  
COMMITTEE**

**9 NOVEMBER 2017 AT 11:30AM**

**Agenda Item No:**

**5**

**Report No:**

**RP/07/17**

**GOVERNMENT CONSULTATION - BUILDING THE RIGHT  
HOMES IN THE RIGHT PLACES**

Presented by the Head of Planning and Strategic Partnerships

**SUMMARY**

Members are asked to note the implications of this report which outlines the Governments' recently published draft Objective Assessment of Housing Need. As a national consultation it affects every local authority in the country. The draft assessment identifies that the pattern of housing growth experienced during the last decade in the riparian boroughs and districts will continue. This report is not seeking to critique the approach advocated but just to report the anticipated impacts on the Regional Park. This poses challenges and opportunities for the Regional Park in equal measure.

**RECOMMENDATIONS**

Members Note: (1) the contents of the report.

**BACKGROUND**

- 1 The identification of an appropriate formula to correctly identify the extent of housing growth is a vexed issue. During the last decade this issue has increasingly dominated local plan inquiries as local planning authorities and consultants debate the merits of various methodologies. Safeguarding a five year supply of housing sites required to meet demand has become a critical issue in the determination of planning applications and appeals.
- 2 In its White Paper, 'Fixing our Broken Housing Market' (2017), the Government committed to producing a consultation on the assessment of housing need which would be 'standard', designed to provide a consistent and transparent method which would be both realistic about current and future housing pressures. This method was published in September in a draft paper, 'Planning for the right homes in the right places'.

## PLANNING FOR THE RIGHT HOMES IN THE RIGHT PLACES

- 3 The new approach included in the draft white paper seeks to be simple, based on publicly available data from the Office of National Statistics, (ONS) and realistic based on the actual need for homes in districts. The consultation paper makes it clear that the figures resulting from the proposed methodology are a minimum and authorities can plan for more if for example they are in an area of new employment growth or planned infrastructure. The proposed methodology includes a baseline established from ONS data. This is derived from the annual average household growth over the previous decade and projected forwarded during the proposed 'plan period'.
- 4 The growth figures are adjusted to account for 'market signals', using the median affordability ratios which would be based on a workplace based median house price to median earnings ratio from the most recent year that data is available. The inclusion of these figures into a basic formula identifies results in a figure for projected housing growth. Although the use of formula implies a rational approach it is complicated by the government intending to cap the level of increase in housing numbers with reference to the current status of the local plan. For authorities with a local plan adopted within the last 5 years the cap will be limited to no more than 40% increase above the annual requirements as set out in the adopted local plan. For authorities with a local plan adopted more than 5 years ago the cap will be at 40% above whichever is higher of the ONS projected increase or the annual housing requirement figure set out in the current local plan. Some comment is made within the consultation to the proportion of land within each local authority which is constrained by Green Belt or similar designation.
- 5 The consultation paper is seeking to make changes to the National Planning Policy Framework (NPPF 2012) in several areas. These include the need for a 5 year review of local plans and that once adopted the housing projections should be considered reliable for a period of two years post adoption. The consultation also proposes the inclusion in the NPPF additional provisions to strengthen the existing 'duty to co-operate' through 'Statements of Common Ground' which would set out the strategic cross boundary planning issues. It is proposed that these statements are in place within 12 months of the adoption of the revised NPPF. Other provisions suggested relate to viability in relation to the intended thresholds which local planning authorities intend for affordable housing and related to this a mix of housing needs.
- 6 The Government intends to ensure that by 2020 all land in areas of greatest housing need should be registered by HM Land Registry and has as part of the consultation published a register of local authorities where this is required, London Borough of Haringey is included.

## CONCLUSIONS

- 7 Whilst the draft proposals are to be welcomed in attempting to focus on this important matter the proposed approach only serves to highlight the major challenges it faces. Over the last three years London's proposed housing completions per annum have risen from 42,000 in 2014 although at the time the ONS anticipated 49,000 new homes would be required and under the proposed methodology it is likely to be around 72,400 although the Greater London Authority (GLA) has recently published forecasts that only an additional 66,000 homes are required per annum, of which 65% should be affordable.

- 8 The methodology involving an extrapolation of past trends with assumptions on affordability has inevitably resulted in considerable growth being anticipated for each of the riparian boroughs and districts. These are highlighted in Appendix A to this report. Appendix B to this report includes details of the proposed growth figures from the GLA for the riparian London boroughs. The differences in the two sets of figures highlights the challenges involved in this whole debate.
- 9 The impact of such continuing high rates of housing development point to the continued importance of the Regional Park as a resource for nature conservation, recreation and leisure where land is at a premium for these uses. It also highlights the opportunities enabled by the Authority's adopted Corporate Land and Property strategy; this is particularly important in the context of the proposed CrossRail 2 scheme where the riparian authorities may be considering opportunities for additional growth given the opportunities this scheme poses.

### **ENVIRONMENTAL IMPLICATIONS**

- 10 There are no environmental implications arising directly from the recommendations in this report.

### **FINANCIAL IMPLICATIONS**

- 11 There are no financial implications arising directly from the recommendations in this report.

### **LEGAL IMPLICATIONS**

- 12 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966. The Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 13 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

### **RISK MANAGEMENT IMPLICATIONS**

- 14 There are no risk management implications arising directly from the recommendations in this report.

### **EQUALITY IMPLICATIONS**

- 15 There are no equality implications arising directly from the recommendations in this report.

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**BACKGROUND REPORTS**

Planning for the homes in the right places

September 2017

**APPENDICES ATTACHED**

Appendix A            Schedule of riparian authorities with projected housing growth  
                                 figures  
Appendix B            GLA Housing Projections

**LIST OF ABBREVIATIONS**

ONS                    Office of National Statistics  
NPPF                  National Planning Policy Framework  
GLA                    Greater London Authority

Appendix A to Paper RP/07/17

Government Housing Projections

Local Authority	Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)	Current local assessment of housing need, based on most recent publically available document (dwellings per annum)	Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest	Most recent adopted Local Plan number <sup>1</sup> (dwellings per annum)
Broxbourne	559	454	64%	No adopted plan number
East Hertfordshire	1,111	745	37%	No adopted plan number
Enfield	3,330	1695 - 2400	38%	733
Epping Forest	923	514	94%	No adopted plan number
Hackney	3,251	1,758	0%	1,160
Haringey	1,148	1,357	2%	820
Newham	3,840	2,355	2%	2,500
Tower Hamlets	4,873	2,428	0%	2,885
Waltham Forest	2,416	2,017	23%	760

## Appendix B to Paper RP/07/17

### GLA Housing Projections

<b>Borough</b>	<b>Total 10 Year Capacity</b>	<b>Annualised</b>
Enfield	18760	1876
Hackney	13300	1330
Haringey	19580	1958
Newham	38500	3850
Tower Hamlets	35110	3511
Waltham Forest	17940	1794