

## **Bexley Local Plan**

### **Matter 4 - Promoting Mixed and Balanced Communities**

(Policies SP2 and DP1 – DP6)

#### **4.1 Is policy SP2 justified in terms of the 6,850 new homes proposed to be delivered and in particular:**

##### **(a) should the plan seek to exceed the London Plan 10-year target for Bexley?**

The London Plan at paragraphs 4.1.1-2 states:

*4.1.1 The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure.*

*4.1.2 For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The advantage of strategic planning is that it allows London to focus development in the most sustainable locations, allowing all of London's land use needs to be planned for with an understanding of how best to deliver them across the capital. Because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA.*

For the reasons given in the London Plan we consider that the London SHMA sets the housing requirements for the London boroughs, including targets for older persons housing, student housing, etc.

##### **(b) Is the plan adequately clear about (i) the period (i.e. the years) to which the 6,850 relates; and**

##### **(ii) the target for new housing in Bexley (and the evidence justifying that figure) beyond the period of the London Plan 10-year target?**

#### Overall requirement

The Local Plan, including Policy SP2, is unclear about the precise time-period over which the 6,850 new homes will be delivered. However, the Local Plan Housing Trajectory (para. 1.34 onwards) indicates that the 6,850 target will begin to be delivered from 2021/22.

The London Plan sets a target for the ten-year period running from 2019/20 to 2028/29. The targets for the London boroughs are based on an assessment of the likely capacity within each borough. Because the Bexley Local Plan is adopted later than the London Plan, the full 6,850 figure will need to be delivered between 2021/22 and 2030/31.

## Planning beyond 2028/29

The Bexley Local Plan is unclear about what the housing requirement will be for the period beyond 2030/31. It is important to establish this for the purposes of monitoring performance and for the Housing Delivery Test. The Housing Trajectory at Annex C appears to be a statement of capacity. This is helpful, but it cannot be a substitute for a plan figure. The column 2029/30 to 2033/34 indicates that a total of 1,871 homes will be provided or just 374 homes per year over five years. This is a figure that is well below the London Plan requirement for 685dpa for the first ten years, and well below the level of new supply needed as indicated by other evidence, including Bexley's SHMA of 2020 (we refer to our earlier representations).

The London Plan at paragraph 4.1.11 states:

*“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”*

The Council's solution is to roll forward the small sites assumption for the period post 2028/29. This is supported by the London Plan. This would equate to a figure of 305dpa.

Such a low figure would clearly be inadequate. It would not address the requirement in national policy for local plans to meet objectively assessed housing needs in full (NPPF, para. 11, b). The cumulative evidence points to the full housing need (e.g. an objectively assessed housing need) being somewhat greater than 305dpa. For example, the Bexley Growth Strategy indicates a need for 1,050dpa.

The Council's approach is unsound. It should roll-forward the London Plan target of 685dpa, in the same way as other London boroughs have done.

The alternative is to adopt a Plan that will run for ten years, making provision to prepare a new local plan to reflect a new London Plan. If the new London Plan is not adopted in time, then Bexley should default to the Standard Method, assuming this will still be in place.

### Small sites supply

We note paragraph 1.39 of the Bexley local Plan. It states:

*“Small sites (smaller than 0.25ha) make up 45% of Bexley's 10-year housing target, as set out in London Plan Table 4.2. Small sites are expressed as a windfall allowance in the housing trajectory, which is considered an appropriate approach in London.”*

**4.2 In terms of its requirements in respect of the different types and mix of dwellings does policy SP2 provide an appropriate level of flexibility whilst ensuring that all particular housing needs are met?**

**4.3 Are policies SP2 and DP3 in general conformity with the London Plan and otherwise justified in respect of housing for older people and residential care**

**accommodation? And in particular:**

**(a) are the need figures of 1008 specialist older person accommodation units and 43 residential care accommodation units supported by evidence in the SHMA?**

We refer to our representations. The Council cleaves to the London Plan to set the housing requirement for Bexley. For consistency, it must adhere also to the London Plan for the requirement for older persons accommodation, taking note also of what London Plan Policy H13 says about the types of accommodation that the benchmark targets in Table 4.3 apply to. The Mayor of London treats London as a single housing market area. Need is assessed for the whole of London and then targets are apportioned on the basis of judgements about capacity. To plan for fewer homes than the number stipulated by the London Plan would result in an undersupply for London as a whole.

The Bexley Local Plan should refer to the London Plan indicative figure of a need for 145 units of older persons housing a year.

These are not binding targets for the Council, but indications of the level of supply needed within Bexley to address the needs of older people living in London as a whole.

**(b) Are the policies likely to be effective in meeting the housing needs of older people and is it justified to require there to be an identified need for the tenure and type of accommodation proposed?**

The London Plan has established the need for older persons accommodation. There is no need for the Council to quibble further about the necessity of such homes.

**4.4 Is the soundness of the plan dependent on clear requirements being set out in respect of “meanwhile” housing?**

No comment.

**4.5 Are the plan’s requirements in respect of affordable housing:**

**(a) sufficiently clear, having regard to the references to 50% provision in policy SP2 and 35% provision in policy DP1 and in terms of the meaning of “a threshold approach”?**

We refer to our representations. The Council should align with the London Plan threshold approach as set out in Policy H5. The viability evidence indicates that stipulating a bench line of 50% affordable housing would be challenging for applicants to achieve in most cases.

**(b) in general conformity with the London Plan, in particular with respect to “habitable rooms” and affordable housing requirements on public sector and industrial land?**

The London Plan requires 50% affordable housing on public owned and industrial land.

**(c) sound in the absence of specific requirements in respect of First Homes?**

The Plan should make provision for First Homes in line with the Written Ministerial Statement of 24 May 2021. This Statement says:

*“Local plans and neighbourhood plans should take into account the new First Homes requirements from 28 June 2021. Local authorities may therefore need to review the tenure mix for the remainder of the affordable housing that they are seeking to secure. However, we also recognise that there will be a number of local plans and neighbourhood plans that have been prepared based on the existing National Planning Policy Framework and that have reached more advanced stages of the plan-making process. We do not intend that the evidence base for these should be re-opened, thus delaying the plan-making process. The following transitional arrangements will therefore apply.*

*Local plans and neighbourhood plans that have been submitted for Examination before 28 June 2021 are not required to reflect the First Homes policy requirements. Additionally, local plans and neighbourhood plans that have reached publication stage by 28 June 2021 will also not be required to reflect the First Homes policy requirement as long as they are submitted for Examination before 28 December 2021. However, reflecting our desire to introduce First Homes requirements at the earliest possible opportunity, Planning Inspectors should consider through the Examination whether a requirement for an early update of the local plan might be appropriate.”*

The Bexley local Plan was submitted after the 28 June 2021 therefore it ought to make provision for First Homes.

**(d) supported by robust evidence to demonstrate their financial viability?**

**(e) likely to ensure that the identified need for such housing is met?**

**4.6 Is the policy SP2(2c) requirement for 3.2 gypsy and traveller pitches based on robust evidence and is there evidence to indicate that this need is likely to be met through intensification or extension of existing sites? Are the requirements of policy DP4 justified and consistent with national policy? Should policy DP4 refer to the extension of an existing site in addition to intensification?**

No comment.

**4.7 Is more flexibility in policy DP1’s requirements (eg in respect of space and amenity standards) necessary for the plan to be sound and is it appropriate for criteria DP1 (1c) to require compliance with a Supplementary Planning Document? Would the requirement be more appropriately phrased “achieve satisfactory space, accessibility, amenity and environmental performance, having regard to published guidance.”?**

**4.8 Is policy DP1(5) effective and consistent with national policy in terms of selfbuild and custom housebuilding?**

We refer to our representations. The policy is too vague to provide an adequate steer to a potential applicant about when it is ‘appropriate’ to make provision for self-build and custom-build.

**4.9 Is policy DP2 justified, effective and consistent with national policy and in particular is it justified to require “no adverse effects on privacy and amenity”**

**as opposed to “no unacceptable adverse effects....”?**

We refer to our representations. The Council has a high small sites target (45% of its overall requirement) but few small site allocations (as far as we can gather by looking at the evidence). The Council hopes that most of the supply will come as windfall.

At present, the policy will only consider small sites within the Sustainable Development Locations (SDL) but it is likely that the Council will need to encourage the delivery of more small sites in more diverse locations. The stipulation that sites will be considered only if they are within the SDL should be removed: small sites should be encouraged in every location of the borough.

Furthermore, part C requires that these sites provide a ‘high standard of amenity that makes a positive contribution to the area’. This is vague and might become a hinderance to those seeking to advance proposals. The Local Plan establishes the policy requirements for new housing, and policies SP5 and DP11 establish design requirements. This should be sufficient.

**4.10 Is policy DP5 justified and effective and is it appropriate for part 2 of the policy to require accordance with standards which are not part of a development plan document?**

No comment.

**4.11 Is policy DP6 in general conformity with the London Plan and otherwise justified and effective?**

No comment.

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