

Environmental Services,
Planning & Development,
London Borough of Waltham Forest
Municipal Offices
16 The Ridgeway
London
E4 6PS

9th July 2004

Dear Sir or Madam.

Waltham Forest UDP Review: Pre-Inquiry Changes

Thank you for giving the House Builders Federation (HBF) the opportunity to comment on the Pre –Inquiry Changes to the replacement UDP. The HBF have considered the proposed document and have the following comments to make:

PIC 2.4:

Priority for re-use or redevelopment should be given to residential use over commercial use, in order to maximise housing delivery, in line with PIC 3.4 and the proposed alterations to Para 3.39 and 3.39A.

PICs 3.7, 3.8 and 3.14:

HBF notes that the requirement for affordable housing has increased, as a result of the updating of the Housing Needs Survey. It is important to understand that increasing the target of affordable housing will not automatically increase the quantity of affordable housing output. Firstly, it is essential to seek an affordable housing provision, in both quantity and type, which will not render a residential development unviable. The availability of SHG is particularly significant to this. Also, with the majority of residential development taking place on Brownfield land, it is increasingly likely that if affordable housing requirements are too onerous, the residential land value will not exceed either the existing land value or commercial land values, so that if the site is developed it will be commercial rather than residential. This will inevitably result in fewer housing developments and thus, less affordable housing.

When taking the Housing Needs Survey into account, it is evident that the Council will not meet the need within the plan period. Therefore, the issue becomes one of prioritising and optimising affordable housing provision. It is essential that any indicative target, is just that, and that the Council employs a

degree of flexibility. It is preferable to set a target, which will not deter development proposals coming forward but ensures that permissions will be deliverable and will not render schemes unviable.

PICs 3.22 and 3.23

PICs 3.22 and 3.23 state that all new housing should be built to 'Lifetime Homes' standards and ten percent of new housing should be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

With regards to lifetime homes and wheelchair housing, this involves the internal layout of the building falls under Building Regulations and does not fall within the remit of Town and Country Planning legislation.

Draft Planning Policy Statement 1 (PPS 1) supports this view. The final sentence of Para 1.29 states:

“ Planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements, such as those set out in Building regulations which concern the internal layout of a building.”

As a consequence, the Council should withdraw these changes.

Thank you again for giving the HBF opportunity to partake in the UDP consultation. I look forward to your acknowledgement of these comments.

Yours sincerely,

Jonathan Sheldon
Assistant Planner – HBF London