



HOUSING EVIDENCE LOCAL PLAN TOPIC PAPER

September 2020

Introduction

1. This paper supports the preparation of the LBBD Draft Local Plan (regulation 19 consultation version) by setting out the approach and policy position in relation to housing evidence, explaining the links between the evidence base and the proposed policies. The specific policies which this paper supports include:
 - Strategic Policy 3: Delivering homes that meet people's needs
 - Policy DMH 1: Affordable Housing
 - Policy DMH 2: Housing Mix
 - Policy DMH 3: Specialist Housing
 - Policy DMH 4: Houses in Multiple Occupation (HMO)
 - Please note that policy DMH 5 which relates to Gypsy and Traveller Accommodation is covered in a separate topic paper.

Context to housing provision

2. The LBBD housing policies have been prepared in line with both National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), and the London Plan. The current London Plan was adopted in 2016, and whilst this includes numerous provisions in relation to housing, this is anticipated to be superseded soon. The emerging New London Plan, which will replace this, has been through several consultation stages and examination, with the latest 'Intend to Publish' document being published in December 2019. Consistent with the approach set out in paragraph 48 of the National Planning Policy Framework 2019 (NPPF), the housing policies in the LBBD Local Plan have been prepared to be in general conformity with the Intend to Publish version of the New London Plan. In addition, the evidence base for the New London Plan is more up to date than that prepared for the current London Plan and therefore this has also been used to inform the approach in LBBD.

3. LBBD is a fast-growing area and in order to achieve sufficient supply of homes to meet needs, a long-term and ambitious approach is required to housing supply in the borough over the next 20 years. The key elements of the strategy for housing in LBBD include (i) regeneration in Barking Town Centre; (ii) intelligent use of industrial land to provide for housing; and (iii) a focus on development of council owned sites. More information on these strategy elements is set out below.
 - i. Proposals to regenerate and increase the provision of homes in Barking Town Centre have been in progress for over a decade, with the Town Centre Area Action Plan being published in 2011 which sought to facilitate regeneration focussed around Barking Station. The result of this is clear, with hundreds of new homes provided and more being constructed. The approach to housing provision in the Local Plan continues the ambition to regenerate Barking Town Centre, helping to create a more vibrant, attractive and diverse community¹.
 - ii. In terms of the more intelligent use of industrial land, the borough is in part characterised by large industrial areas, and whilst these serve an important purpose for the local economy and that of London as a whole, a review undertaken to inform the local plan has found these to offer accommodation which is ageing, too small and does not provide the appropriate specification for most market needs. The provision and allocation of housing has therefore taken account of plans to remodel existing industrial land to make it both more attractive to users and more efficient in terms of floorspace, thereby freeing up land for housing.
 - iii. LBBD owns significant areas of land within the borough, some of which are currently employment and residential estates. Acting on behalf of the council, Be First are actively engaged in bringing forward large areas of council owned land for redevelopment to provide an uplift in housing through increasing density and changing landuse patterns. A further key strategy to provide the homes needed is a programme of estate renewal, which seeks to create new, more efficient housing developments on existing housing estates.
4. These three strategic elements are to be substantially delivered within identified Transformation Areas which offer the potential for higher density and taller development, particularly near the existing or planned transport hubs. These include Barking town centre and surrounds; Barking Riverside; Thames Road and River Road; Castle Green; Chadwell Heath; Dagenham Dock and Dagenham East. These areas will provide significant amounts of new housing, whilst existing residential neighbourhoods, including Becontree Estate and Dagenham Village, will be the focus of smaller-scale developments.
5. The ambitious, long-term delivery of the Transformation Areas is anticipated to take 15 to 20 years. LBBD Council is aware of the critical importance of ensuring that there is enough physical and social infrastructure in place to support early development and new communities emerging in advance of the major transport improvements/investment and other place making improvements.
6. There are multiple landowners across both the public and private sectors; phasing and complementary delivery of this land will need to be coordinated through strategic planning and other tools such as Compulsory Purchase Orders (CPOs).
7. Funding and financing new infrastructure will be challenging, particularly when considered alongside the delivery of affordable homes. To achieve this, additional public-sector funding and or financing support will likely be required.
8. The following sections of this document set out the key issues which are addressed by the Local Plan in LBBD, with a summary of the key background and context, followed by an explanation of the policy approach set out within the LBBD Draft Local Plan (regulation 19 consultation version).

a) Identifying the overall housing target

Background and context

9. The identification of housing targets for all planning authorities should follow a process set out in national policy and guidance, and London Boroughs should be in general conformity with the London Plan. Specifically, NPPF paragraph 35a states that in order to be 'sound', plans should "*provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs*". NPPF paragraph 60 states that local planning authorities should use their "*local housing need assessment, conducted using the standard method² in national planning guidance*" to determine the level of need for new homes within their authority area. Whilst this is the case, it is important to note the 'two-tier' nature of planning in London, as the London Plan is supported by housing evidence, which applies in part to LBBD.
10. The housing target in the LBBD Local Plan is informed by the emerging New London Plan (Intend to Publish version) and the relevant parts of the evidence base for this. Principally this is the Greater London Authority Strategic Housing Market

¹ The Council is currently preparing a Barking Town Centre Strategy, which will be due in the future.

² For reference, the relevant part of the NPPG which sets out the standard method is 2a-004-20190220.

Assessment (2017) (the GLA SHMA 2017) and the findings of the examiner of the emerging New London Plan. A separate strategic housing market assessment has also been prepared for LBBB which was commissioned in 2019 and updated in 2020 (the LBBB SHMA 2020). This considers the GLA SHMA 2017, content of the emerging New London Plan and a housing requirement figure calculated using the government's standard method in accordance with the NPPF and NPPG. It also assesses the needs in relation to affordable housing provision and the needs of specific groups including older people, families and students, thereby providing a full picture of the housing need within the borough.

11. The GLA SHMA 2017 is a specific evidence base produced for London, that takes into account London-specific factors including economic trends, demographic trends, and market trends. The GLA SHMA 2017 identified that London needs around 65,900 additional homes each year between 2016 and 2041. In order to meet this requirement, the July 2019 version of the emerging New London Plan set out provision for a total of 649,350 homes to be delivered in London between 2019-2029, and 22,640 in Barking and Dagenham within this timeframe. However, at examination, the deliverability of the proposed targets was found to be unsound, and a new method for calculating targets was devised³. As a result of this, the targets for London as a whole and the individual boroughs were revised down to accommodate lower deliverability assumptions. The Intend to Publish version of the emerging New London Plan (December 2019) sets out a target of 522,870 homes for London between 2019-2029 and 19,440 homes in Barking and Dagenham within this timeframe. The Inspector's report for the examination of the New London Plan recognises that this provision of homes will not meet the full need for London within this timeframe, however considers the reduced targets more likely to be sound given that they are based on deliverability considerations and therefore are more realistic in terms of what will be achievable.
12. The LBBB SHMA 2020 assesses the housing need for the borough using the standard method set out in NPPG (Reference ID: 2a-004-20190220). This identifies a requirement of 2,225 homes per annum for the LBBB area. This is similar to the 22,640 over ten years requirement set out in the July 2019 version of the New London Plan.

LBBB Policy approach

13. As set out in section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004, the LBBB Local Plan must be in general conformity with the London Plan. The ten-year housing target for Barking and Dagenham as set out in the Intend to Publish version of the emerging New London Plan is 19,440 dwellings (between 2019-2029), which can be interpreted as 1,944 homes per annum. This is based on evidence of need and deliverability and is considered to be the most appropriate minimum target for the borough. Draft Policy SP3 'Delivering homes that meet people's needs', sets out a target to achieve at least 1,944 homes a year in accordance with the latest emerging New London Plan (Intend to Publish version). Furthermore, in recognition that this may not fulfil the need for the borough and of the ambitious proposals to support regeneration in the borough, the policy seeks to increase delivery above this level, delivering over 40,000 homes over the period 2020-2037, which is the equivalent of 2,222 homes per year. This is very similar to the objectively assessed need identified in the LBBB SHMA (which was 2,225 homes per year) and the GLA SHMA 2017 (22,640 over ten years or 2,264 a year) and is therefore considered appropriate.
14. Housing delivery is dependent on bringing forward sites for new homes and the delivery of homes therefore does not usually follow a linear progression of a regular number of homes per year. Instead, delivery can come forward in peaks and troughs, with some years delivering less than the target and others exceeding it. Policy SP3 therefore refers to an indicative trajectory for the delivery of homes set out in Table 2 of the Draft Local Plan. Further explanation of the trajectory is set out below.

b) Assessing housing capacity

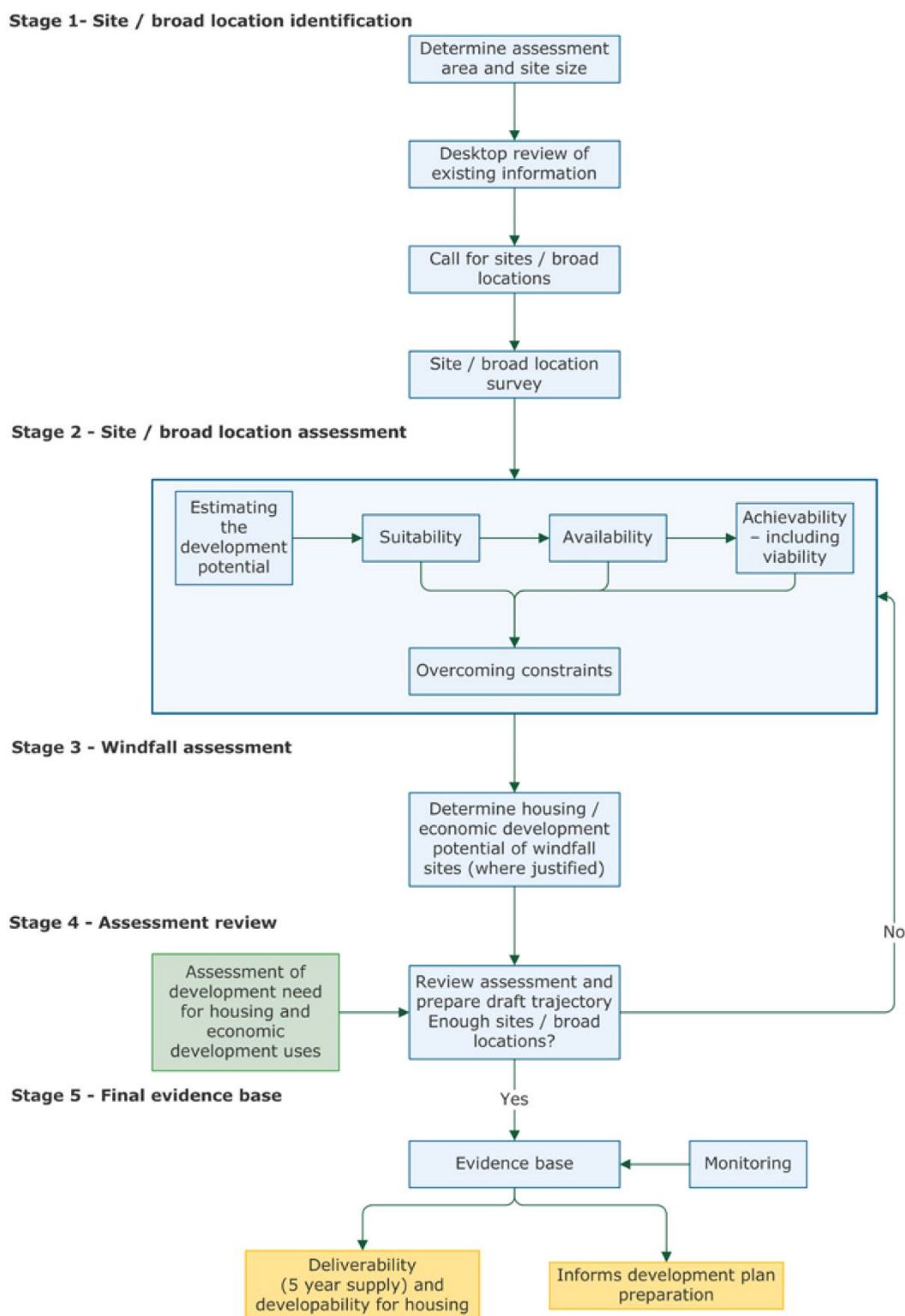
Background and context

15. Paragraph 120 of the NPPF sets out that planning policies should be informed by regular reviews of land availability. The NPPG provides specific guidance on how to undertake reviews of land availability using a process known as a land availability assessment. For reference, the relevant part of the NPPG is at Reference ID: 3-001-20190722.
16. A strategic land availability assessment has been prepared for LBBB (LBBB SLAA 2020) in order to identify sites which may be able to come forward for development within the Draft LBBB Local Plan period, thereby being able to contribute towards the delivery of the Local Plan, in particular the achievement of targets relating to the delivery of new homes.
17. The process for preparing the LBBB SLAA 2020 is summarised in figure 1 below, which is taken from the NPPG. The following text provides additional information about the work stages undertaken. Information to inform the LBBB SLAA 2020 was collected from various sources, including desk-based research, site allocation information from the extant Local

³ See inspectors report and recommendations at https://www.london.gov.uk/sites/default/files/inspectors_report_and_recommendations_2019_final.pdf page 41 for relevant conclusions.

Plan, a 'call for sites' process and direct communication with the site promoters (these are a mix of developers, agents and landowners). Where site information was missing and the promoters unknown, land registry searches were undertaken and the landowners were contacted.

Figure 1: Strategic land availability assessment overview



Stage 1 – Site location identification

18. The Council considered all available types of sites and relevant sources of data in identifying potential sites for development, in accordance with the NPPG. The sites identified were capable of providing for 5 or more dwellings, in accordance with the threshold defined in the NPPG. Sources of supply considered by the council include:
- Sites with planning permission/consent which are under construction;
 - Sites with unimplemented planning permission/consent;
 - Allocated housing/mixed use sites shown in the Site Allocations DPD and Barking Town Centre AAP, which have not received planning permission/consent;
 - Allocated economic development sites shown in the Site Allocations DPD and Barking Town Centre AAP, which have not received planning permission/consent;
 - Additional new sites submitted during the 'call for sites' exercise which was carried out between 12th April and 27th May 2019;
 - Sites with lapsed or refused planning permissions and those where applications have been withdrawn;
 - The industrial sites and retail / economic development study evidence base; and
 - Other sites identified by council officer intelligence.
19. During this stage we identified the location and boundary of the sites, and their total area.

Stage 2 – site assessment

20. The site assessment methodology aligns with the NPPG, and assesses sites to determine their suitability, availability, achievability and development potential (that is, capacity).

Assessing suitability

21. The SLAA methodology utilises a map-overlay based Geographical information Systems (GIS) approach to make a high-level judgement as to whether the site may be considered suitable in planning terms for housing. This appraises each site against 19 different environmental indicators.
22. The indicators were appraised to determine:
- Whether there was likely to be a constraint which could prevent the development of the majority of the site (identified as a critical constraint).
 - Whether the constraint affected the site but could most likely be addressed through the planning application process using relatively straight forward and commonplace mitigation practices, or allow partial development of the site (identified as an intermediate constraint).
 - Whether no constraint was identified at all (no constraint identified).

Assessing availability

23. In accordance with the provisions of NPPG, "a site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development". Assessments of availability were based on the submissions in the call for sites forms, direct liaison with promoters and reviewing progress on site or through the planning process. In addition to ascertaining whether sites are likely to be available for development within the plan period, the assessment also considered when each site is likely to be available for development (for example immediately or within five-year tranches from 2020).

Assessing achievability

24. The LBBB SLAA 2020 includes a review of the achievability of each site. This considers the likely achievability in terms of market and cost factors. This considers Market factors – whether there likely to be sufficient strength in the housing market to enable the development of the site – this is based on the LBBB Draft Local Plan Viability Study (2019) which sets out that although there are challenging viability issues in some areas of the borough, emerging policies are suitably flexible in relation to developer contributions that development can come forward, even in low value areas or if they comprise high density schemes.
25. Assessment of achievability also considers cost factor dependencies – that is, is there likely to be a significant constraint to developing the site which is likely to increase the cost of developing the site to unviable levels, for example the cost of

demolishing existing structures on the site, land remediation or flood mitigation, or any other physical development cost which is likely to make development unviable.

26. **Assessment of achievability** also considers likely delivery rates. It is assumed that all sites will be constructed at a rate of up to 250 units per year, unless there is specific evidence indicating that the delivery rate will likely be different, for example where site promoters have provided specific development trajectories. This is a conservative approach, and Be First is committed to actively encouraging and enabling modern methods of construction (MMC) which might increase the build out rate in the future.

Assessing development potential

27. Development potential was informed where possible by information provided in relation to each site – for example where a planning consent had been gained or application made, the quantum set out in this was used, similarly, where discussion with promoters or the call for sites information set out a capacity, this was also used to inform the assessment. Where a capacity figure was not available, a formula-based approach to capacity calculation was undertaken. This reflected the formula based approach of the GLA SHLAA 2017 which assumes different development densities according to the character of the area (whether it is central, urban or suburban), defined density areas (opportunity areas and town centres defined by GLA are areas with potential for higher density) and accessibility, which was assessed using the Transport for London Public Transport Accessibility Levels (PTALs) 2021 scenario.

Stage 3 – windfall assessment

28. Based on assumptions as set out in the GLA SHLAA notes for London Borough of Barking and Dagenham (2017), the borough has an average windfall delivery of 69 homes from smaller sites each year. It is considered appropriate to utilise the previous trends to reflect likely future provision. As such, an element of windfall development at 69 homes per year has been included in the LBBB SLAA 2020.

Stage 4 – assessment review

29. This stage of the LBBB SLAA 2020 includes an assessment as to whether sufficient capacity is available to deliver the housing target in the borough, and the preparation of a housing trajectory. More information about the preparation of a development trajectory, which is based on the information identified through the LBBB SLAA 2020, is set out below.

Stage 5 – final evidence base

30. The LBBB SLAA 2020 is essentially a large spreadsheet setting out the sites assessed and conclusions in relation to their suitability, availability, achievability and development potential. The LBBB SLAA 2020 concludes whether sites are 'deliverable' (i.e. will come forward within the next five years) or developable (i.e. will come forward within the plan period), or not, as the case may be.
31. The LBBB SLAA 2020 is supported by a methodology paper which sets out the methodology utilised to undertake the SLAA in more detail. It should be noted that the LBBB SLAA 2020 represents a snapshot in time of an evolving situation, as sites identified will be built out and new sites will come forward.
32. NPPF paragraph 68 sets out that planning authorities should identify sufficient land to 'accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved'. The LBBB SLAA 2020 includes sites of all sizes as long as their capacity is 5 units or greater, enabling an assessment of whether or not this target can be achieved – this is discussed below in relation to site allocation and the preparation of a trajectory.
33. The Intend to Publish version of the New London Plan includes policy H2 'small sites' requires London boroughs to proactively support well-designed new homes on small sites (below 0.25Ha in size). The LBBB SLAA 2020 includes sites which meet this definition as long as their capacity is 5 units or greater, enabling an assessment of whether or not this target can be achieved – this is discussed below in relation to site allocation and the preparation of a trajectory.

LBBB Policy approach

34. The LBBB SLAA 2020 provides information on the sites which can come forward within the plan period. These are of a range of sizes (the LBBB SLAA 2020 assesses all known sites of 5 and above units in accordance with NPPG). The sites which are considered to be deliverable within the plan period have the potential to be allocated within the local plan. In order to focus the allocated sites to those sites which can make the greatest contribution to development of the Borough, a

series of criteria have been developed to select sites for allocation from those included in the LBBB SLAA 2020 database. All sites which meet the following criteria have been proposed for site allocations:

- have a total site area or remaining developable area (where applicable), of greater than 0.25Ha; and
- deliver 150 dwellings or more over the Local Plan period; or
- can deliver a critical/essential piece of identified infrastructure for the area over the Local Plan period; or
- small sites (less than 0.25Ha) that do not have planning permission (in order to demonstrate LBBB's level of compliance with emerging New London Plan Policy H" 'small sites').

35. Sites which meet these criteria have the capacity to deliver 41,725 dwellings in the plan period (please note this does not include windfall). This exceeds the housing target which is explained in the above sections of this report. Draft Policy SP3 'Delivering homes that meet peoples' needs' of the Draft Local Plan sets out that at least 40,000 dwellings will be delivered on site allocations between 2020 and 2037. This figure is considered to be appropriate given the potential capacity is considered to be very slightly in excess of this figure (4%), thereby allowing for the potential that a very small number of sites which are currently anticipated to come forward, may stall or be subject to unidentified constraints which mean that they cannot reach their anticipated capacity within the plan period.

c) Preparation of a housing trajectory

Background and context

36. As set out above in this paper, the overall quantum of new homes required in LBBB is at least 1,944 homes per year as set out in the Intend to Publish version of the emerging New London Plan, although the policy intention set out in Policy SP 3 'Delivering homes that meet peoples' needs' is to deliver more homes than this - at least 40,000 in total. A strategic land availability assessment has been undertaken to determine the potential capacity for the delivery of new homes in LBBB and which can be allocated to come forward within the plan period. The total figure identified from this process very slightly exceeds the 40,000 target.
37. The NPPF states at paragraph 73 that "*strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies*".
38. The NPPF states at paragraph 67 that "*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*
- a) specific, deliverable sites for years one to five of the plan period; and*
 - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan*".
39. The NPPF defines 'deliverable' and 'developable' sites in its Glossary:
- "To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years*".
- In accordance with the above, it can be seen that it is necessary to prepare a housing trajectory setting out the anticipated delivery of homes over the plan period.
40. NPPF paragraph 73 also sets out that where a local authority has delivered below 85% of its housing requirement, the housing requirement for the first five-year period of the new local plan is to be increased by a buffer of 20%. In LBBB, the

2019 Housing delivery Test⁴ identified that delivery over the past three years was at 51% of the current requirement, and so a 20% uplift to the annual housing targets must be applied for the first five years following adoption of the Local Plan. An Housing Delivery Test Action Plan must also be produced. LBBD Council has sought to address the issue of low delivery rates through the creation of a pioneering, wholly owned regeneration company called 'Be First', which has an overall objective to support the delivery of 50,000 new homes in the borough. Early signs that the new regeneration company is having a positive effect in relation to housing delivery are reflected in the number of homes which have received planning consent in the past three years, which has more than doubled between 2016/17 and 2019/20 (to around 2,250 homes receiving consent in 2019/20 – if these were delivered within a year of each other, this would result in a housing provision that is greater than both the current London Plan housing requirement and the Intend to Publish version of the emerging New London Plan). The 20% increase in housing provision required has been factored into the housing trajectory.

41. In addition to needing to produce a housing trajectory, NPPF paragraph 68 sets out that planning authorities should identify sufficient land to 'accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved'.
42. The Intend to Publish version of the emerging New London Plan includes Policy H2 'small sites' requires London Boroughs to pro-actively support well-designed new homes on small sites (below 0.25Ha in size). It sets out a target for LBBD to achieve 199 homes a year on small sites, which are part of the overall target for housing provision. It is important that the housing trajectory indicates the supply from sites under both 1Ha and 0.25ha to address these requirements.
43. Paragraph 70 of the NPPF sets out that windfall (defined in the NPPF glossary as 'sites not specifically identified in the development plan') may be considered as part of anticipated supply where compelling evidence suggests that they will provide a reliable source of supply.

LBBD Policy approach

44. In accordance with the requirements set out above, a detailed housing trajectory has been prepared for LBBD. This is based on work undertaken as part of the LBBD SLAA 2020, which is summarised below, and the GLA SHLAA 2017. The trajectory sets out the number of homes anticipated to be delivered in five-year trenches from sites with planning consent and allocated sites which are anticipated to come forward within the plan period. A detailed version of the trajectory is included in the updated five-year housing supply statement. It is important to note that, as with the LBBD SLAA 2020, the trajectory represents a snapshot in time of an evolving situation, as sites identified will be built out and new sites will come forward.
45. The housing trajectory is summarised in Table 2 of the Draft LBBD Local Plan, which is reproduced in Figure 2.

Figure 2: Summary of housing trajectory (Table 2 of the Draft LBBD Local Plan)

Delivery period	Years	Indicative delivery target	Indicative annual delivery target
Overall housing target	2019-20 – 2036/37	42,737	
Short term	2019/20 – 2023/24	10,817	2,163
Medium term	2024/25 – 2028/29	18,470	3,694
Long term	2029/30 – 2037/38	13,450	1,681
Small and windfall sites			
Long term	2019/20 – 2036/37	1,242	69

46. The trajectory takes the ten-year housing requirement from the Intend to Publish version of the emerging New London Plan, and presents this an annualised target of 1,944 homes a year between 2019/20 and 2028/29. For the first five years

⁴ Available from <https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

(2019/20-2023/24), the minimum housing requirement is increased by 20% to take account of the requirements for under-delivery of housing in recent years, to 2,333 per year.

47. Between 2029/30 and 2033/34 the minimum annual requirement is taken from the GLA SHLAA 2017 calculated capacity for this period, which is equivalent to 2,740 homes a year.
48. Between 2034/35 and 2036/37, the minimum annual requirement is taken from the GLA SHLAA 2017 calculated capacity for this period, which is equivalent to 1,908 homes a year.
49. Based on assumptions as set out in the GLA SHLAA notes for London Borough of Barking and Dagenham (2017), the borough has an average windfall delivery of 69 homes from smaller sites each year. It is considered that this previous trend is likely to be reflected in future provision. As such, an element of windfall development at 69 homes per year has been included in the housing trajectory. However, where planning permissions for small sites have been granted (small sites in this context are less than 0.25Ha in area but of five or more units), these have been discounted from the windfall totals in accordance with anticipated delivery for each year. This is because sites of this size were not allocated and would therefore be considered as windfall in the trend-based calculation. This provides a more accurate position in relation to windfall. The total amount of homes anticipated to be delivered through windfall is 1,012 over the plan period.
50. Overall the housing trajectory identifies that through sites identified in the LBBB SLAA 2020 and windfall, a total of 42,737 homes can be delivered between 2019/20-2036/37. This exceeds the policy target of 40,000 homes for the same time period, by around 4%.
51. There is greater certainty around the figures in the first five years of the trajectory and these will be more robust than the figures in the latter stages of the trajectory. This is a natural consequence of site delivery timescales which means there is greater certainty in the earlier stages of any plan.
52. In relation to delivery and the requirements of NPPF paragraph 73 to increase housing delivery following the failure to deliver 85% or more of the annual housing requirement in LBBB, the annual housing requirement for the first five years has been increased by 20% to 2,333 homes. The trajectory indicates that delivery over this timeframe is likely to fall short of the requirement, particularly in light of the buffer which makes meeting the target even more challenging. However, if the following year (2024/25) is taken into account, then an excess of provision is anticipated. As such, whilst the trajectory may not achieve the required supply in the years 2019/20-2023/24, this will be remedied within the following year.
53. In relation to the delivery requirements of the emerging New London Plan to provide 19,440 homes over the first ten years between 2019/20-2028/29, the trajectory identifies that this will be significantly exceeded, as 29,287 homes are anticipated to come forward in this time, an overprovision amounting to half of the total requirement.
54. In relation to the requirements of NPPF paragraph 68 that 10% of homes should be delivered on sites of less than 1Ha, the housing trajectory identifies 3,545 homes are anticipated to come forward on sites of this description. Whilst this is less than 10% of the overall housing requirement, significant effort has been made to identify all sites which are able to come forward in the plan period, as such it is considered to be the case that there is not a sufficient supply of sites of 1Ha or less which are able to be brought forward. This reflects the nature of LBBB, in that the greatest provision of new housing is to be achieved on large scale sites, particularly within the identified Transformation Areas. It is possible that additional work to bring forward sites under the small sites programme being prepared to meet the requirement of the emerging New London Plan Policy H2 will identify more sites of 1Ha or less which can be included in future versions of the trajectory.
55. In relation to the London Plan requirements set out within Policy H2, and the target to bring forward 199 homes a year on sites smaller than 0.25Ha, the trajectory identifies that this target will not be achieved on the basis of sites which are currently known. However, it is important to note that this is a relatively new requirement and Be First are preparing a programme to bring forward delivery of small sites, which is anticipated to significantly boost supply from these small sites.
56. It is important to note that LBBB is in a period of transition in relation to housing provision. The establishment of Be First to significantly increase housing delivery in the borough is already being shown to be effective through the significant increases in the number of homes receiving planning consent, and it is anticipated that as work to identify and bring forward council owned sites continues, with a specific focus on small sites, that national and London policy ambitions in relation to five year delivery and small sites will be achieved.
57. Most importantly, sufficient land supply has been identified to exceed the housing target of 40,000 homes over the plan period. Housing delivery in the next ten years is expected to exceed the housing requirements of the emerging New London Plan by around half of the total requirement again.

d) Affordable housing provision

Background and context

58. NPPF paragraph 20 of the NPPF sets out that strategic policies should set out an overall strategy for the provision of housing (including affordable housing).
59. NPPF paragraph 34 sets out that plans should set out the contributions expected from development, which should include setting out the levels and types of affordable housing provision required.
60. NPPF paragraph 61 sets out that an assessment of the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). Please note that gypsy and travellers are covered in a separate topic paper.
61. NPPF paragraph 62 sets out that planning policies should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and that this contributes to the objective of creating mixed and balanced communities.
62. NPPF paragraph 63 sets out that in order to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by an amount equivalent to the existing gross floorspace of the existing buildings. This mechanism of contribution reduction is known as 'Vacant Building Credit'. It does not apply to abandoned buildings.
63. NPPF paragraph 64 sets out that at least 10% of residential units on major schemes should be affordable housing, unless this is justified by a number of factors, such as a development resulted in an overprovision of affordable housing in an area or the development is for a particular type of accommodation (e.g. build to rent, for special groups, self-builders, or 100% affordable housing developments).
64. The Intend to Publish version of the emerging New London Plan includes the following requirements which relate to affordable housing:
 - The GLA SHMA 2017 identified that 65 per cent of London's need is for affordable housing
 - Policy GG4 sets out a strategic target of 50% affordable homes provision
 - Affordable housing should normally be provided on site
 - Developments of nine or fewer units should seek financial contributions for affordable housing from such sites
 - Public sector land should deliver 50% affordable housing across the portfolio
65. Policy H5 is key in that this sets out the approach to when viability assessment will be required. This sets out a threshold of at least 35% affordable housing (which is 50% for schemes on public sector land where there is no portfolio agreement with the Mayor, and for sites on strategic industrial sites and non-designated industrial sites which are appropriate for residential uses where the industrial capacity would be lost overall). Developments which meet the threshold without public subsidy and which provide suitable a tenure mix can follow the 'fast-track' route, whereby they are not required to produce viability information. Developments that provide 75% affordable housing (regardless of any subsidy) are also permitted to use the fast-track approach. Developments that do not meet the relevant threshold will need to go through the 'viability test route' which requires transparent scrutiny, a late stage review and potentially reviews at other stages.
66. Policy H6 sets out that the following tenure mix for affordable housing should be secured:
 - 30% low cost rented homes
 - 30% intermediate cost homes
 - 40% to be determined by the boroughs (low cost or intermediate)
67. The emerging New London Plan also sets out that the following tenure types are preferred:
 - homes based on social rent levels, including Social Rent and London Affordable Rent
 - London Living Rent
 - London Shared Ownership

68. To assist boroughs in meeting identified need, Mayoral funding will be available through the Homes for Londoners Affordable Homes Programme on a tariff basis, details of which are set out in the Mayor's Homes for Londoners: Affordable Homes Programme 2016-21.
69. Policy H7 requires boroughs to ensure clear monitoring takes place in order to ensure the delivery of affordable housing is at the levels set out in legal agreements and to report on delivery across the borough.
70. London Policy is supported by the Mayor of London's policy guidance, which although relates to the current London Plan is not proposed to be amended.
71. The LBBB SHMA 2020 estimated 2,067 households per annum cannot afford to pay the market entry threshold cost and therefore need affordable housing. The average annual supply of affordable housing units based on relets of social sector stock and resales of Shared Ownership properties is estimated at 510 units. Deducting this from gross need provides a net annual requirement for affordable housing of 1,557 units per annum.
72. A viability report was prepared to inform the production of the Draft Local Plan and specifically, to test the ability of developments to accommodate emerging policies of the Draft Local Plan. This reviewed the ability of development to provide for affordable housing at different levels, based on the proposed tenure splits which are included in the Draft Local Plan. The viability assessment identified that there are significant variations in the percentages of affordable housing that can be provided, depending on private sales values, scheme composition and the existing use value of the site. The results of the assessment do not point to any particular level of affordable housing that most schemes can viably deliver. The authors of the assessment recommend that the current strategic target of 50% with a minimum target of 35% (as set out in the emerging New London Plan) be retained, applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account. They advise that setting a lower proportion of affordable housing is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more would no longer do so.

LBBB Policy approach

73. The net annual requirement for 1,557 affordable homes will be met primarily through Draft Policies SP 3 and DMH 1. Draft Policy SP3 sets out that LBBB Council will seek to achieve the maximum reasonable amount of affordable housing on all private sector housing schemes, subject to viability and site context.
74. In order to be in general conformity with the emerging New London Plan Draft Policy DMH1 sets out that LBBB will seek an overarching 50% on-site affordable housing target, by applying the thresholds for 'fast track' and 'viability test' approaches set out in the Mayor of London's policy guidance and include early and advanced stage review. The mechanisms for this are set out in Policy DMM 1 'Planning Obligations'. It recognised that this target may be challenging to achieve on all individual sites and that public-sector support would likely be required to achieve this target in many instances, for example, affordable housing grant, capital infrastructure grant, public borrowing etc.
75. Draft Policy DMH 1 sets out a tenure split of 50% social housing and 50% intermediate housing in accordance with the emerging New London Plan (30% London Affordable Rent; 30% Intermediate; 40% locally determined). This balanced approach has been undertaken to ensure the provision of affordable housing meets the needs of the community over the plan period.
76. Draft Policy DMH 1 also sets out scenarios where payment in lieu will be appropriate.
77. There is a clear recognition that the building of affordable homes by developing residential-led schemes on council-owned land is a key mechanism by which the required amount of affordable housing will be achieved.
78. It is considered that the above approach would strike the right balance between setting an ambitious local target, which could potentially be achieved on some higher density and higher sales value sites without significant infrastructure costs, whilst recognising that viability would always be a legitimate consideration. In addition, the target tenure mix will support the local economy by providing a range of homes at different affordable price points to meet the needs of people working in the borough which could result the intensification of exiting employment uses and creation of new employment uses in the borough.

e) Dwelling size

Background and context

79. NPPF paragraph 61 sets out that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in the planning policies.

80. The LBBB SHMA 2020 has undertaken an analysis of current dwelling sizes and compared this to anticipated changes in the size of various groups including one person households, couples and couples with children. This suggests a complex picture, with an increase in the proportion of one person households, a decline in the proportions of households with dependent children, and growth in the proportions of other (multi-adult) household categories. This said, the absolute number of these households will increase, in line with a general increase in population. The SHMA uses a trend-based scenario to project the mix of dwelling sizes that will be required to meet the anticipated proportion of population groups.
81. In-house assessment by Reside, an affordable housing provider owned wholly by LBBB Council has identified needs for affordable housing tenures.

LBBB Policy approach

82. Draft Policies SP3 and DMH1 set out the housing types according to different tenures which are required in the borough.
83. Draft Policy DMH2 sets out the dwelling sizes which are required to come forward in the Borough in order to meet the likely needs. These are different for private housing and affordable homes, for reasons set out below.

In order to ensure that the appropriate mix of dwelling sizes is provided by new development, the information from the LBBB SHMA in relation to projected dwelling size needs has been used to directly inform the size mix for market housing.

For affordable housing, the mix of housing required to meet the needs of those considered likely to inhabit affordable housing has been included in the policy.

f) Housing for community groups

Background and context

84. NPPF paragraph 61 sets out that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in the planning policies. NPPG also sets out that plan-making authorities should assess the need for housing of different groups and reflect this in planning policies. NPPG also sets out ways in which the requirements of specialist housing can be identified (reference IDs: 67-001-20190722 and 63-001-20190626 onwards).
85. The proportion of older people in Barking and Dagenham is lower than in most areas of London. However, as with the rest of the country, it is increasing. By 2041 the number of those aged over 65 is projected to be nearly 40,000. This represents a 72% increase on 2016 figures.
86. Policy H13 of the emerging New London Plan sets out that Boroughs should identify sites which may be suitable for specialist older persons housing, and also includes an indicative benchmark for the provision of 70 units of specialised older persons housing per annum for LBBB, stating that this figure has been provided to inform a local level assessment. this figure would be part of the overall housing quantum for the borough. This does not include care homes, but rather units which are purpose built for older persons with potential arrangements for care services to be provided. Policy H13 of the emerging New London Plan also includes requirements relating to the design and location of older persons housing.
87. The LBBB SHMA 2020 reports that local assessment undertaken by the council identifies that there is generally sufficient stock of sheltered housing, however the quality and condition of this could be improved. This said, there is little additional capacity and so it is considered a priority to retain the current number of units. The council has also identified a deficit of extra care housing in the Borough. This assessment indicates a need of only 180 units between 2018 and 2028, which is lower than the emerging New London Plan benchmark of 70 units a year would suggest, however indicates that using two different models of assessment, there is a deficit of extra care which needs to be addressed during the LBBB draft local plan period. The LBBB SHMA 2020 also identifies that there is requirement for sheltered housing and extra care including the provision of 2 or more bedrooms, to allow for care scenarios where an additional bedroom is needed.
88. The LBBB SHMA 2020 also considers the needs of wheelchair users. It identifies that there is a 'flow' of around 112 social rented wheelchair units into availability per annum, of which some 60 are sheltered or have had some form of support provision attached. Against this, there is the backlog unmet need for 330 wheelchair accessible homes (i.e. a need for approximately 220 wheelchair accessible units).
89. Policy H15 of the emerging New London Plan sets out that Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed.
90. There is currently no purpose-built student accommodation in LBBB. The LBBB SHMA 2020 authors have liaised with the two institutions in the borough which generate a need for student accommodation. The SHMA identifies approximately 6,000 students within the Borough. These largely occupy the private rented sector.

91. The nature of specialist housing means that it often requires more considered design to ensure that it is fit for purpose for the intended users. It is important that buildings are able to be adapted to accommodate changing needs of its users.
92. Due to the nature of specialist housing it is possible that there may be effects on local residents, for example resulting from significant numbers of visitors to extra care schemes. It is important that designs of specialist housing seek to safeguard amenity of surrounding areas.

LBBB Policy approach

93. The Council recognises its duty to provide supported and specialist housing for meeting a wide range of needs. A new housing strategy for older persons (the Older People's Pathway) is being prepared by LBBB, although it should be noted it also provides for other community groups including vulnerable people, not just older people. It will emphasise the importance of helping people to remain independent for as long as possible, with all the benefits that brings in term of social inclusion and wellbeing. The strategy will set out a clear older person's housing pathway, from support in their own home, through sheltered, Extra Care and residential nursing if necessary.
94. Draft Policy SP3 sets out that the council will support applications which include the provision of specialist housing that seeks to meet the needs of specific community groups including older people, disabled and vulnerable people, students and Gypsies and Travellers (please note that Gypsies and Travellers are the subject of a separate evidence paper). The support for specialist housing provision is reiterated in Draft Local Plan Policy DMH 3 which also sets out expectations in relation to provision of specialist housing. This draft policy sets out that developments should demonstrate that they meet the relevant Mayoral policy requirements in order to be in general conformity with the emerging New London Plan. In order to safeguard the current stock, this draft policy also provides protection for existing specialist housing, unless there are reasons to justify its loss, such as resulting in an overall improvement in condition and quality within the Borough.
95. Draft Policy SP3 also sets out the council's ambition to work proactively to help ensure that new homes are marketed to and occupied by those who live and work in LBBB or surrounding areas. This is because the assessments which set out the need for the housing consider the requirements of Barking and Dagenham and therefore it is considered important that the new homes provided within the borough are used to address this need. This also helps to reduce commuting distances helping to achieve reductions in transport related greenhouse gas emissions.
96. With specific regard to older persons, to ensure general conformity with the emerging New London Plan, Draft Policy DMH3 sets out support for schemes that demonstrably meet the Mayor's annual indicative benchmarks for specialist older persons housing for the borough (i.e. 70 units per annum). Policy D7 of the emerging New London Plan is also referred to within Draft Policy DMH3 to ensure that housing provision for older persons is suitably accessible and adaptable. It is considered that by meeting the emerging New London Plan policy, which requires around 10% of new homes to be wheelchair accessible, provision for wheelchair users within the borough will increase sufficiently (ten percent of the total anticipated housing provision is approximately 4,000 homes, which is considered likely to be able to meet the needs identified in the LBBB SHMA 2020).
97. Draft Policy DMH 3 also includes requirements relating to the design and location of specialist housing in order to ensure that it is provided in locations which facilitate access to goods and services by more sustainable modes of travel and to ensure that the designs satisfy user requirements. The draft policy also sets out the requirement that sheltered housing and extra care includes two bedroom and larger sizes, to allow for a variety of care needs, as highlighted in the SHMA report. The draft policy also includes a requirement for developers to demonstrate that an appropriate operator has been identified to operate the scheme once built. The draft policy also includes consideration to be taken in relation to safeguard surrounding amenity.
98. The Council is actively proposing to include specialist accommodation within developments on its own land, which are being progressed through the Be First regeneration company. The development of council-controlled land is a key mechanism by which the policy ambitions set out in the Draft Local Plan and the emerging New London Plan will be achieved.

g) Shared housing

Background and context

99. The LBBB SHMA 2020 considers the housing needs of families. It identifies that there is likely to be a large increase in the number of working age people in the Borough (a 46% increase is anticipated), and that family formation and growth are important issues. The SHMA identifies that a significant proportion (approximately a third) of families (a parent / guardian

with at least one dependent child) are dependent on the private rented sector. Changes to the affordability of this sector may be a significant issue for the provision of family homes.

100. There is a long history of loss of self-contained housing to houses in multiple occupation (HMOs) in Barking, which is a threat to the aforementioned families which rely on private rented sector accommodation. The council brought in an Article 4 direction in 2012 so as to make it necessary for planning permission to be obtained in order to convert homes to HMOs. Local plan policy at the time also stipulated that planning applications for HMOs should be refused in streets where this would create a situation where the proportion of HMOs in any one street was greater than 10%, and that a self-contained home could not be converted to an HMO if it neighboured an existing HMO, unless separated by a road.
101. There is market demand for larger shared living schemes which is an alternative housing solution to renting a self-contained home or room within an HMO. Policy H16 of the emerging New London Plan sets out expectations for large scale purpose-built shared living developments. It also stipulates that affordable housing contributions are expected to be provided as cash in lieu.

LBBB Policy approach

102. Draft Policy SP3 sets out that the council will seek to safeguard the supply of self-contained homes, in particular family homes, in order to help ensure that, along with the provision of the 40,000 new homes, there is sufficient housing for families in the Borough over the plan period.
103. This draft policy also sets out the councils support for purpose built shared housing and innovate approaches where it meets other development plan objectives.
104. Draft Policy DMH 4 sets out the Councils approach to shared housing and houses in multiple occupation. In relation to purpose built shared housing schemes the policy re-iterates that the requirements of the emerging New London Plan will require to be met, and that proposals should meet an identified need. The policy sets out that these should be located within the transformation areas as set out in Chapter two of the draft LBBB Local Plan. These are areas of significant regeneration and will be served by good levels of transport accessibility and include services and facilities that make them ideal places for shared living schemes to be located.
105. In relation to HMOs the policy sets out detail which continues the current approach, thereby seeking to safeguard the number of self-contained homes to help provide for the needs of families.

h) Construction and innovation

Background and context

106. In order to help meet the housing target of at least 40,000 homes set out in Draft Policy SP3 in a more efficient and sustainable way, which also meets the needs of the future residents, it is considered that a range of approaches to construction will be required. This includes provision of opportunities for self-builders to create their own homes and others to custom build homes to meet their specific requirements.

LBBB Policy approach

107. Draft Policy SP3 sets out that the Council hopes to see local organisations playing a key part in leading on the delivery of new homes, and its commitment to researching innovative approaches to housing delivery including construction methods.
108. Draft Policy SP3 also sets out the Council's support for self-build and custom-build, subject to proposals adhering to other Development Plan policies.