

Local Plan Partial Review Issues and Options Consultation Summary



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Section 10: Housing

Issue 1: Meeting the Borough's housing target

Question 1

Are there any sites that should be considered as a site allocation as part of the Local Plan Partial Review for housing? If so, please complete the Call for Sites section of the Consultation Response Form.

18 responses (plus additional for the call for sites).

Key points:

- Discussion Group:
 - Given the pressure for housing, should the Council consider taking a less restrictive approach to the release of small offices?
 - Concern that there is no explicit policy support for the provision of new housing in the Local Plan.
- A number of comments have been made along the lines that meeting housing targets should not mean increasing densities. Some comments have been made on the robustness of the borough's objectively assessed need (575 dwellings per annum) which was identified in the Strategic Housing Market Assessment (SHMA) and is below the borough's annual housing target of 733 dwellings per annum. The Mayor of London for example has commented that *"The borough should satisfy itself that the methodology behind this figure is robust. In particular the council are encouraged to ensure the approach takes sufficient account of 'market signals' as required by the NPPG and the Mayor's Draft Interim Housing SPG"*.
- Historic England have also commented that the capacity for the borough to accommodate new housing development while maintaining its historic environment should be a key consideration. They support references to the mansion block typology in the consultation document.
- No significant new sites that the Council was not aware of have come forward as a result of this consultation. Some small sites have been put forward. However, they are either too small to contribute to reducing the shortfall or their existing use is such that they may not be suitable for housing. The list of sites that have been put forward is presented below.

Ref No.	Respondent Name	Site Address	Stated Capacity	Site Area	Current Use	Proposed Use	Approx completion year
1	Savills	92 Lots Road	Not stated.	680 sq m	B1	A number of possible uses for the site are stated and not just residential.	2018
2	Royal Brompton & Harefield NHS Foundation Trust c/o DP9 Limited	Royal Brompton Hospital, Sydney Street		1.5 Ha		Hospital and related medical uses and ancillary facilities approximately 12,500 sq.m	2019
3	Chelsfield LLP (Sarah Waller) for Carraig Investments Sarl	Former Knightsbridge Fire Station, 16 Basil Street, SW3 1AL		396sqm	Vacant Former Fire Station (Sui Generis)	Retail - 482sqm A1-A3 (if not B1 - see below)	2020
4	Rolfe Judd Planning (John Osborn) for the Legard Family	Land to the West of Highlever Road (Formerly Clifton Nurseries), Nursery Lane, W10, 6QD	10-14 dwellings	0.48 Ha	Public open space provision and parkland	Residential	2017
5	St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	142a Highlever Road W10	6-10 units	1,200 sq m approx	Garage workshop and petrol filling station	Residential	2018
6	TfL (Lee Campbell)	South Kensington Around Station Development (ASD) site, Pelham St/ 20-32 Thurloe Street, SW7 2NB	Feasibility study due Summer 2016 Residential-led mixed use development.	0.35 Ha	Retail, housing, commercial		
7	Savills (Aimee Squires)	100A West Cromwell Road					

Issue 2: Amalgamations and de-conversions

Option 1

Maintain a planning policy approach that permits amalgamations of existing units up to a defined threshold of units and/or floorspace.

31 responses (for all the options).

Key points:

- Joint Scrutiny Committee: Members supported consideration of the criteria in both options 2 and 3 (as detailed on page 167 of the report) in order to prevent cumulative loss of residential units through de-conversions & amalgamations.
- Discussion Group:
 - Question about whether the demand for amalgamations was being generated by a lack of new family sized units being built.
 - Support for a possible exemption for Listed Buildings (although some considered that Listed Buildings could be considered as ‘material considerations’ and an exemption is not needed in the policy wording).
 - Need to ensure an appropriate mix of units in new build schemes to reduce pressure for amalgamations.
- Need to ensure the policies are flexible to take account of market demand.
- A number of responses appear to support option 1 but with additional exemptions included. Firstly, some planning consultants have commented that the existing policy (i.e. resist amalgamations of 5 or more dwellings) should not be changed. In the event it is changed there should still be a threshold. Camden has been quoted as an example on a couple of occasions where amalgamation of up to 2 dwellings is allowed resulting in the loss of one dwelling only.
- Some consultants have challenged the Council’s reasoning behind seeking a policy change. It has been stated that the numbers lost through amalgamations are not very high, that the Council is able to meet its housing targets despite these losses, there are benefits of amalgamations in providing much needed family sized accommodation and the Council should recognise the demand for prime properties in the Borough and London’s role as a global city.
- Cllr Moylan supports the retention of the existing policy although he acknowledges that there may be scope for discussion whether the limit of five units currently set in Policy CH2 should be four or even three. The main point he makes is that *“the “freezing” of the existing housing stock makes it impossible to adapt to changing demand (the existence of which we acknowledge) and threatens to drive out investment in the quality of the existing stock.”*

Option 2

Introduce a presumption against the loss of residential units subject to specific exemptions. Possible exemptions include:

- Restoration of a house to its original use as a single dwelling subject to a maximum of two dwellings being combined and an overall floorspace limit.
- Where the existing accommodation is substandard in terms of floorspace standards, daylight and layout which could only be remedied through an amalgamation.

Are there any other criteria or exemptions which the Council should consider?

Key points:

From the responses received it would appear that Option 2 or a variant of it (mixed with either Option 1 or 3) is acceptable to most people who have commented. In addition, the Mayor of London has stated that *“Given the scale of residential loss through amalgamations (issue 2) and the need to meet a higher housing target, the Mayor would support an option that seeks to resist the loss of residential accommodation, subject to limited exemptions. This would be in line with paragraph 5.1.10 of the Mayor's Draft Interim Housing SPG.”*

The types of exemptions stated in the responses are –

- Improve substandard provision
- Provision of much needed family sized accommodation
- Reverting to an original form of dwelling
- Reverting a listed building back to its original form

Allowing amalgamations of properties to revert back to an original family home has been supported in a number of responses.

Option 3

Resist the loss of all residential units unless it can be demonstrated that the de-conversion is required to create a decent standard of accommodation.

Key points:

Some of the residents' associations seem to favour this option. However, detailed comments have only been provided by the Kensington Society. The Society supports option 3 and states that the focus should be on how to produce more homes and firmly limiting the losses, particularly of small, affordable homes. It states that option 2 would be its fallback option.

Issue 3: Setting an affordable housing target

Option 1

Adopt a Borough wide affordable housing target of between 30-35%.

25 responses approximately for all options.

Key points:

- Joint Scrutiny Committee: Members supported option 1 (page 170 in the report) namely for a borough wide affordable housing target of between 30-35%.
- Discussion Group:
 - Some support for having a higher affordable housing target in areas with higher values. Has the potential to encourage greater investment in lower value areas in greater need of regeneration.
 - Question raised about whether any developments in higher value areas had ever achieved 50% affordable housing – a lack of such evidence would suggest that an even higher target would be even more unfeasible?
- Not many detailed comments have been received on this issue. Some support for Option 1. A few consultants have explicitly supported a reduced target albeit many point to a need for flexibility in these targets. For example, Nathaniel Lichfield and Partners (on behalf of St William) state that a 30-35% target is not viable on the Kensal Gasworks site due to the high costs of decontamination and that a maximum reasonable amount should be provided subject to viability.
- The Mayor supports the borough's aim of providing a range of housing for a broad range of income ranges. Whilst the Mayor appreciates a fixed affordable housing target can provide certainty for developers, any target for affordable housing should be established in line with London Plan policy 3.11 in order to maximise affordable housing provision across the borough Kensington and Chelsea will also need to consider how emerging Government policy on housing as set out in the Housing and Planning Bill may impact a fixed affordable housing target.
- A few comments have been made about the definition of 'affordable' housing (NB: for planning purposes affordable housing is defined in [Annex 2 of the NPPF](#)).

Option 2

Adopt a split affordable housing target to enable a higher percentage target in the highest value areas.

Key points:

Option 2 seems to be favoured by residents' associations such as the Kensington Society, Norland Society and Silchester Residents Association. Some consultants are opposed to this option and prefer a more straightforward borough-wide target (Option 1).

Issue 4: Affordable housing tenure split

Option 1

Set a Borough wide target of 72% social/affordable rented housing and 28% intermediate housing to take specific account of the findings of the SHMA.

20 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: When put to the vote, six Members supported option 2, three supported option 3 and none were in support of option 1 (detailed on page 173 in the report).
- Discussion Group:
 - Concerns expressed about the polarisation of housing i.e. only making provision for the wealthy that can access market housing or those in need who are eligible for the Council's housing register. Very few options for those in between.
 - Support for increasing the supply of intermediate options but concern expressed that it was difficult to deliver shared ownership housing within the borough that was affordable.
 - Questions about whether the viability work had taken account of the newly proposed tenure splits and what currently underpinned its assumptions.
- Not many detailed comments have been received on this issue.
- Some consultants have commented that the tenure split should not be over prescriptive and offer flexibility on a case by case basis.
- Silchester Residents' Association and Kensington Society prefer Option 1 with Kensington Society stating that Option 4 would be their second choice.
- The Mayor of London has stated that *"Policies on tenure split, thresholds and payments in lieu should also be developed with a view to achieving the maximum affordable housing output in line with London Plan policy 3.3 and the Draft Interim Housing SPG, taking into account local evidence, viability and deliverability. With regard to tenure split, London plan policy 3.11, seeks a split of 60% of affordable housing as social and affordable rent and 40% intermediate rent or sale. Kensington and Chelsea's split should be based on its evidence of local need taking account of availability of funding for certain products and development viability."*

Option 2

Set a Borough wide target of 17% social/affordable rented housing and 83% intermediate housing based on the Council's adopted Intermediate Rent Policy.

Key points:

No detailed comments on option 2. See comments set out under Option 1 above.

Option 3

Set a Borough wide target of 56% social/affordable rented housing and 44% intermediate housing based on the mid-point intermediate rents set out in the SHMA.

Key points:

A few respondents have selected option 3 but no detailed reasoning has been provided for their preference. See comments set out under Option 1 above.

Option 4

Set a Borough wide target that takes account of the three scenarios (set out under the first three options) together with further information collated from Registered Providers and developers on the viability of delivering intermediate rent units.

Key points:

See comments set out under Option 1 above.

Issue 5: Affordable housing threshold

Option 1

Maintain the existing approach with affordable housing (contributions or floorspace) sought on schemes with in excess of 800sqm of residential floorspace, with payments in lieu of affordable housing floorspace for schemes only between a minimum of 800sqm and 1,200sqm.

15 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Cllr Marshall (Chairman) commented that Members supported a system that captured as much value for the delivery of affordable housing as possible whilst avoiding perverse consequences.
- Discussion Group:
 - Concerns expressed in relation to Option 2 (lowering the threshold for affordable housing) and its impact on smaller scale developers. Having a cliff edge approach incentivises developers to either bring in schemes below the threshold or way above.
 - RBKC approach is more complicated than other boroughs, although some considered the existing approach worked well.
 - Contribution from Octavia Housing (a Registered Provider) that they are generally happy to manage a small number of units (2-3) in small/ medium-sized schemes where this level of affordable is negotiated.
- Most of the responses to this issue are from planning consultants. A general theme in the consultants' responses is a preference to retain the existing approach i.e. Option 1. Gerald Eve for Cadogan Estate in fact would like to see the threshold for commuted payments increased from the existing 1,200 sq m to 1,600 sq m. Some comments have also been made about making sufficient in lieu provision and/or off-site provision where it can be justified including for large sites for instance where it would help with estate regeneration.

Option 2

Broadly maintain the existing policy but with an amendment to ensure that once the 800sqm threshold is met, all net floorspace is liable for an affordable housing contribution, i.e. the first 800sqm will no longer discounted.

Key points:

One or two respondents prefer Option 2 but they have not provided an explanation of their preference.

Option 3

Consider a revised minimum threshold for the provision of affordable housing in light of local viability evidence demonstrating that small schemes could deliver a proportion of affordable housing. It is anticipated the threshold would continue to be expressed as floorspace to ensure that sites providing a small number of larger units are not exempt from the requirement for affordable housing.

Key points:

Kensington Society have indicated strong support for on-site affordable housing provision, with off-site and financial contributions as the exception and support Option 3. Silchester Residents Association also supports Option 3. See comments and recommendation under Option 2.

Option 4

Consider the removal of the fixed range for payments in lieu between 800sqm and 1,200sqm GEA floorspace and instead apply the general policy provisions for when off site or payments in lieu may be considered appropriate.

Key points:

See comments for the other options above in particular Option 1.

Option 5

Consider thresholds for on-site / off-site provision of affordable housing.

Key points:

See comments for the other options above in particular Option 1 and recommendations under Options 2 and 4.

Issue 6: Calculating payments in lieu

Option 1

Calculate all payments in lieu for affordable housing by comparing residual land values on a site-by-site basis by requesting two viability assessments – one reflecting policy compliant affordable housing provision on-site and the second with 100% private housing.

10 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported option 1 (as detailed on page 177 of the report).
- Discussion Group:
 - Support for the ‘Wandsworth’ model as belief this would ensure higher payments in lieu and greater transparency.
 - Payments in lieu may be favourable where they can deliver a greater quantum of affordable units elsewhere than could be delivered on site. For larger sites, the policy could allow a mixture of off- and on-site
 - If the Council were to use the standard charges approach, request for further consultation on the proposed level of the charges.
 - Are the payment in lieu figures linked to the percentage target for affordable housing? Would these need to be re-tested if the targets in the Plan were to be amended?
- Detailed comments have been provided by planning consultants – Bilfinger GVA, Quod Limited and Gerald Eve (on behalf of Cadogan Estates).
- Bilfinger GVA do not support any of the three options as they all follow the same approach and are all too simplistic. They do not account for mixed use development proposals. Issues are raised about market values reflecting current use value, alternative use value, or be derived from direct comparable evidence.
- Quod Limited comment that *“comparing residual land values on a site-by-site basis (Option will be complicated and is likely to lead to delay and/or a reduction in overall housing delivery in the borough due reduced levels of certainty for developers and their funders.”* They also raise the issue of mixed use developments and state that *“The BNPP Payments in Lieu Study only considers existing land use values, this could discourage mixed use development.”*
- Gerald Eve (on behalf of Cadogan Estates) state that Option 1 is fundamentally flawed as a policy compliant level of affordable housing can be zero (see Parkhurst Appeal – APP/V5570/A/14/2227656 para 71). They also support having regard to alternative use values which may have higher values. They also comment that the methodology proposed in Option 2 is incorrect as this would apply an area wide basis of assessment to a site specific matter. They also *“strongly contest the robustness of the proposed rates set out in Figure 10.15.”*
- A general theme of asking for flexibility in policies on a case by case basis emerges in consultants’ responses for this issue as well as others.

Option 2

Introduce zonal payment in lieu charges based on the adopted CIL Charging Zones using benchmark land values and development types to compare residual land values for schemes with and without on-site affordable housing.

Key points:

See issues described under Option 1.

Option 3

Adopt a Borough-wide standardised charge based on benchmark land values and development types to compare residual land values for schemes with and without on-site affordable housing.

Key points:

See issues described under Option 1.

Issue 7: Securing the maximum reasonable amount of affordable housing

Option 1

Require an open book financial viability assessment and any supporting evidence to demonstrate the maximum provision of onsite affordable housing is being proposed on sites which are above the policy threshold and do not meet the revised target for affordable housing.

21 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported options 1 & 2 (as detailed on page 179 in the report).
- Discussion Group:
 - Views expressed that review mechanisms are only appropriate on large multi-phased schemes. Not suitable on smaller schemes as can affect whether a bank is willing to lend money to developers.
 - Review mechanisms will put off smaller developers from working on schemes in RBKC.
 - Question about whether there would be any flexibility for developments to initially go beyond a 'viable' level of affordable housing so that a review mechanism wasn't required.
- There is firm support from the few residents and residents' associations who have responded for more transparency and public accountability of viability assessments and affordable housing negotiations. For example the Silchester Residents' Association state *"The council should be held to the highest standards regarding viability and transparency, especially on policies and projects that affect so many lives, such as estate regeneration. Their partners in these projects should in turn be entirely accountable when it comes to viability and transparency, seeking independent oversight from outside the borough."*
- Most of the planning consultants who have responded support Option 1 although they also make the point that this needs to be balanced with commercial confidentiality. The RICS guidance is referred to in determining what may be commercially sensitive along with decisions by the Information Commissioner decision which concluded that *"public interest in favour of disclosure is outweighed by the public interest in maintaining the exception" (ICO – FS50538429)."*

Option 2

Introduce a policy presumption for the use of review mechanisms upon partial or full completion of a development when financial viability assessments demonstrate that current market conditions will only support levels of affordable housing below the policy target.

Key points:

Some of the consultants are explicitly opposed to Option 2. They make the point that any review mechanisms should only be utilised prior to implementation. They also make the point that only large multi-phase schemes are suitable for review mechanisms. Quod Limited have stated that *"a review mechanism should only be used in exceptional circumstances (i.e. long term multi-phased schemes) or where additional risk is being*

taken to commit to a level of affordable housing that is unviable consistent with RICS Guidance which states "re-appraisals are generally suited to phased schemes over the longer term rather than a single phase scheme to be implemented immediately, which requires certainty" and "the re-appraisal should always be undertaken prior to the implementation of a scheme or phase in order to fully account at the time for the risk the developer is undertaking, and, therefore, the appropriate return" – the priority is enabling delivery of affordable housing to meet housing needs."

Option 3

Provide additional guidance on the information required in financial appraisals to avoid delays in determining planning applications. This could include the creation of the Council's own model for assessing development viability as proposed in the evidence on payments in lieu of affordable housing prepared for the Council by consultants, BNP Paribas.

Key points:

Savills support the principle of this option "provided that the Council consult with relevant bodies in the preparation of such models. At present, we find that the negotiations which take place in regard to financial appraisals are often protracted and severely delay developments. We consider that any proposed policy or guidance should introduce the ability to fast track the pre-application process in relation to financial appraisals where the Council's model is utilised."

Issue 8: Meeting specific housing needs

Older people's housing

Option 1

In light of the need identified for older people's housing the Council should introduce policy support for the provision of new extra care and sheltered housing where this will meet identified local needs, and resist the loss of existing accommodation subject to criteria such as need and the quality of the provision.

20 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported option 1 (page 181 in the report) to provide in principle support for the provision of new extra care and sheltered housing.
- Discussion Group: Housing provision for older people needs to be linked to income – will the units provided for the elderly be affordable? Also needs to be well spread across the Borough to enable elderly people to remain within their community and 'downsize' where appropriate.
- The Silchester Residents' Association supports Option 1 and object to Option 2. It states *"Any provision of extra care or retirement housing must be within existing communities and developments, not segregated."*
- Most residents' associations who have responded support both options 1 and 2. A few comments have been made to use s106 or CIL to fund older people's housing. Not many planning consultants have responded to this issue. Savills support both options although they also make the point that loss of C2 use should be allowed where it is not viable and the policy could include a potential for land use swaps where appropriate.
- Beaumont Properties Limited supports Option 1. It states that this approach offers providers with the flexibility required to deliver a suitable range of Extra Care accommodation throughout the Borough. It also notes that it is surprising that the need included in the SHMA for specialist accommodation for older people is lower than the Indicative Borough benchmark for 2015-2025 contained within the adopted London Plan and this figure should be reviewed.

Option 2

The Council should identify specific sites or locations for the provision of specialist older people's housing.

Key points:

See issues stated under option 1.

Extra care and retirement housing

Option 1

The Council should rely on regional level guidance to determine the key characteristics of extra care and sheltered housing.

Option 2

The Council should set out the essential characteristics for schemes to be classed as extra care or sheltered housing at a local level. .

12 responses approximately across all options.

Key points:

Not many detailed comments have been received on this issue. The Kensington Society supports both options. Beaumont Properties Limited have submitted very detailed comments. It objects to option 1 and is supportive in principle of option 2. However, it highlights the importance of retaining sufficient flexibility and that the policy wording should not restrict developments coming forward.

Supported housing

Question 1

Should the Council resist the loss of existing supported housing which meets identified community needs?

Approximately 14 responses.

Key points:

- Joint Scrutiny Committee: Members supported resisting the loss of existing supported housing which met identified community needs (page 183 in the report).
- Discussion Group: Need to consider provision for young professionals ('new Londoners') starting their first job. Model of housing between student housing and private renting e.g. The Collective 'co-housing' and/or 'co-working'.
- No detailed comments have been received on this issue. The short comments made are in favour of protecting supported housing.

Self build

Option 1

Provide only in-principle support to the self/custom build housing.

Option 2

Identify sites which may be appropriate for self/custom build proposals.

Option 3

Consider introducing a requirement for large schemes over a specific size threshold to make a proportion of units available as custom build.

8 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported option 1 to provide only in principle support for self/custom build housing (detailed on page 183 of the report).
- Discussion Group: General agreement that self-build homes should have general support in policy but concerns expressed about whether developers would be able/willing to give up land to self-builders.
- Gerald Eve and Turley have responded both expressing concern about the impact of allocating land for custom build. Turley state that *“Expecting developers to allocate land they own to self-build housing would be likely to discourage applicants from bringing schemes forwards.”* Gerald Eve (on behalf of Cadogan Estates) has raised *“specific objections with regard to Option B under the Self-build and Custom build headings. It would be wholly onerous to require the large schemes over a specific size threshold to make a proportion of units available as custom build.”*
- There are one or two supportive comments for custom build from residents.

Question 1

Are there any sites that should be considered as a site allocation as part of the Local Plan Partial Review for self/custom build housing? If so, please complete the Call for Sites section of the Consultation Response Form.

0 responses

Overall

Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

Key points:

Kensington Society have raised the issue that student housing should also be covered.

Issue 9: Securing a Suitable mix of housing

Dwelling size requirements

Option 1

Continue with current policy CH2(a) which requires residential developments to take account of local needs as set out in the Council's evidence.

22 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported option 2 to set out specific targets for a housing mix within a revised planning policy, with separate targets for private and affordable housing (detailed on page 185 in the report).
- Discussion Group:
 - Targets can be helpful but the exact type of provision can depend on the location.
 - Need to consider if a target of housing mix was to be set whether this would be assessed on a site by site basis or a strategic target to which individual developments would contribute.
- A general theme in the responses from planning consultants is the need for flexibility and the ability to respond to market signals and site specific considerations. Many seem to support the existing approach of Option 1. Turley comment that option 2 would provide greater clarity to applicants. However, they too ask for the ability to consider this on a site by site basis.
- The Mayor of London has stated “In this regard, the Mayor would also be supportive of a policy that seeks to enable Kensington and Chelsea to meet its minimum London Plan housing supply target by ensuring a mix of unit sizes by floorspace, taking into account local need, and the requirements to optimise housing potential and deliver mixed and balanced communities in line with London Plan policies 3.3, 3.4 and 3.9.”
- In terms of residents' associations, Silchester Residents' Association supports Option 1 and Kensington Society strongly supports the housing mix in Figure 10.17. It indicates that the existing policy supporting provision of family housing has in turn fuelled the issue of amalgamations in the borough.

Option 2

Set out specific targets for housing mix within a revised planning policy.

Key points:

Turley comment that option 2 would provide greater clarity to applicants. However, like many other consultants they too ask for the ability to consider this on a site by site basis.

Prime and super prime housing

Option 1

Continue to assess applications for low density super-prime units on their own merits.

14 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported option 2 and a policy that restricted very large units in new residential developments where the potential housing capacity of sites was not being optimised (page 186 in the report).
- Discussion Group: Support for some super-prime units but the level of provision needs to be monitored. Consideration to be given at the design stage re the flexibility for future de-conversion.
- There seems to be a clear divide in views from residents and planning consultants on this issue. Most of the residents/residents' associations support Option 2 whilst planning consultants support Option 1 and ask for flexibility in the policy on a case by case basis.

Option 2

Introduce a policy that restricts very large units in new residential developments where the potential housing capacity of sites is not being optimised.

Key points:

See comments under Option 1.

Buy to leave

Option 1

The Council should not seek to introduce any restrictions on the period of occupation for new residential properties through planning policies.

19 responses approximately across all options.

Key points:

- Joint Scrutiny Committee: Members supported option 2 and a policy to limit the period during which residential properties could be left vacant to prevent new homes from being used as 'buy to leave' assets (page 188 in the report). Members noted, however, the practical, legal and financial difficulties in enforcing any such policy.
- Residents and residents' associations are supportive of Option 2 whilst planning consultants question if this is an issue which could be controlled through planning and if such a policy would be sound.

Option 2

The Council should consider introducing a policy limiting the period during which residential properties can be left vacant to prevent new homes from being used as 'buy to leave' assets. This would be enforced through planning obligations.

Key points:

See comments under Option 1.

Issue 10: Housing estate regeneration

Question 1

Should the Council retain all elements of the existing policy including the requirement for no net loss of social housing provision? Should the policy be changed in any way?

97 responses approximately.

Key points:

- Joint Scrutiny Committee: Members supported the retention of the policy that prohibited a net loss of social housing provision.
- Discussion Group:
 - The focus of estate regeneration programmes should be to deliver more affordable housing. Concern that in recent schemes e.g. Wornington Green the majority of the new units are private housing which has been marketed overseas. Therefore, need to consider if there should be a policy provision to increase the percentage of affordable housing to support this.
 - Observation that there is much less government grant available to support the replacement of affordable housing through regeneration schemes and therefore there is a need to cross-subsidise to avoid cashflow problems.
- A large number of representations have been received on this issue from residents of Silchester Estate. Many residents have written in making the same statement *“We want rents to stay the same and for overcrowding to be dealt with and to be part of the decision making process.”* Other comments have been made by residents’ associations to the effect that the policy should be about increasing provision and not just ‘no loss of’ social housing provision. Tackling overcrowding and keeping rent levels the same are recurring issues in the comments.
- Silchester Residents Association has made very detailed comments and is questioning *“creating additional housing by demolishing/ regenerating entire estates. This approach is disrespectful both to the well-established and cohesive communities that call the estates home and the well-designed buildings that are far from their end of life.”* It also claims that there is no safeguarding of right to return for secure tenants or leaseholders in this document. It does not agree with the correlation between poor quality housing stock and lower life expectancy in the north of the borough and points out that there are a range of potential reasons for this including poverty and environmental issues (the proximity of Westway). The document does not seek to tackle these issues.
- Councillor Blakeman has also made very detailed comments and questions the benefit of demolition and redevelopment of estates.
- Councillor Dent-Coad points out that in some cases tenants are moved out in the early phases and replaced by temporary tenants. The argument then is made that the developer/Registered Provider is replacing like for like at the point of planning application, i.e. the number of temporary tenants is subtracted.