1. Should the AAP be more ‘visionary’ and ‘ambitious’ in terms of the scale of development proposed? Amongst other things should the AAP: (i) seek to deliver ‘at least’ 2,500 homes; and, (ii) include residential sites that are completed, such as BHL5 and BHL9?1

Relevant representations:

Bhlps57 (Greater London Authority) – The AAP should be more ‘visionary’ and ‘ambitious’ in terms of the scale of development proposed.

Bhlps16 (Lee Valley Estates) – Housing targets for the area should be increased to at least 2,500 homes.

Council response:

i) Should the AAP seek to deliver ‘at least’ 2,500 homes?

1.1 In response to GLA comments that the AAP should be more ‘visionary’ and ‘ambitious’ the Council proposed some modifications to the submitted plan as set out in the Schedule of Post Publication Modifications (document ref: BHLSD2). Subsequently, the GLA have declared that these modifications satisfy their original concerns, and as such a Statement of Common Ground between the GLA and the Council was submitted to the Inspector.

1.2 Within the Schedule of Post Publication Modifications, further wording revisions were also proposed in response to representations from Lee Valley Estates that the plan should provide for at least 2,500 homes. However, the terminology used in the Council’s response (modification number 5) was that Policy BHL2 be revised to read ‘approximately 2500 homes’. At the time, this terminology was chosen by the Council on the basis that the growth target provided by the Core Strategy for the area was ‘up to 2500 new homes’ – see Policy CS1: Location and Management of Growth (document ref: KE165).

1.3 As set out in the Further Alterations to the London Plan, the 2011 Census indicated that London’s population grew at a more substantial rate than expected, and there is therefore a growing need to increase housing provision across London. In this context, it is accepted that there may be some merit in further modifying the wording of Policy BHL2 to read ‘at least 2500 new homes.’ The Council therefore suggest a further alteration to modification number 5 as set out below:

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1 This calls into question the base date of the AAP and whether these were completed after this date.
1.4 Rephrase first sentence of Policy BHL2 to read:

‘As a key growth area, we will seek to deliver at least approximately 2300 2500 new homes by 2026 in the Blackhorse Lane area.’

1.5 The indicative development targets for opportunity sites in the AAP (see modification number 121 from the Schedule of Post Publication Modifications), demonstrates that this target can be met. In addition, it is worth noting that in providing for over 2500 homes in the plan area, approximately 500 units of student accommodation at the Station Hub and Waterfront site have not been counted. This was on the basis that such provision does not contribute to conventional housing supply, including family and affordable housing, and falls under a different Use Class. However, since the plan was submitted, the government’s Planning Practice Guidance on housing and economic land availability now advises that such developments can be considered as contributing towards housing requirements. Paragraph 038, Reference ID: 3-038-20140306, states that: 'All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.’ On this basis, if the Council were to also include these student accommodation units, it is clear that at least 2500 new homes in the plan area can be comfortably provided.

ii) Should the AAP include residential sites that are completed, such as BHL5 and BHL9?

1.6 Since its inception, the AAP has been used as an emerging planning document to attract and guide investment in the plan area.

1.7 The Council considers the base date for its entire Local Plan to be the adoption date of the Core Strategy (March 2012). Sites BHL5 and BHL9 are therefore included in the AAP as the Council’s building control records indicate they were only fully completed in late 2012; after the adoption of the Core Strategy.

1.8 As the AAP supports the implementation of the Core Strategy, the Council considers March 2012 an appropriate base date for the document. Essentially the AAP is intended to offer greater detail of how the headline growth targets from the Core Strategy can be met, and to set out how regeneration efforts can be co-ordinated. Section 1.1 of the AAP seeks to articulate this interrelationship between the Core Strategy and AAP. In addition, section 6.2 of the
Local Development Scheme (document ref: BHLSD14) sets out that the AAP ‘will be a detailed planning framework for development and regeneration in the Blackhorse Lane area up to 2026 – putting into effect the vision set out in the Core Strategy.’

Word count:

815