

Housing Strategy

Overview

Key Objective

Ensure that new housing and estate regeneration creates mixed and diverse residential neighbourhoods.

5.1 This chapter sets out the housing requirements in relation to estate regeneration, affordable housing, housing mix, housing size, housing space, amenity space and accessible housing. [Policy and guidance on housing density requirements in the area can be found in London Plan Policy 3.4 and the Mayor's draft Housing SPG 2011.](#)

Context

5.2 The area surrounding the OA is typically characterised by Victorian terraced housing and mansion blocks, which are generally owner occupied or privately rented. There are also some post-war housing estates located to the east and north of the OA and some modern purpose built residential premises to the north.

5.3 Within the OA, existing housing is primarily located within the West Kensington and Gibbs Green estates. Some of these properties are leasehold or freehold having been purchased under the 'right to buy' initiative. There is also some private residential accommodation located to the south of the OA on Empress Place, Lillie Road and Seagrave Road.

Figure 5.1: Photograph of terraced housing.

Figure 5.2: Photograph of terraced housing.

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Deleted: There is no Key Principle in the Housing Strategy relating to housing density as this is already dealt with by Policy 3.4 in the Mayor's London Plan. The acceptable density of any proposals would be assessed against this policy, which states that taking into account local context and character, the design principles and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2 (of the London Plan). ¶

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Policy Context

5.4 The Mayor's London Plan (2011):

- ['Optimising Housing Potential' \(Policy 3.4\);](#)
- 'Quality and Design of Housing Developments' (Policy 3.5);
- ['Large Residential Developments' \(Policy 3.7\);](#)
- 'Housing Choice' (Policy 3.8);
- 'Mixed and Balanced Communities' (Policy 3.9);
- 'Definition of Affordable Housing' (Policy 3.10);
- 'Affordable Housing Targets' (Policy 3.11);
- 'Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes' (Policy 3.12);
- 'Affordable Housing Thresholds' (Policy 3.13); and
- 'Existing Housing' (Policy 3.14).

5.5 LBHF's Core Strategy (2011):

- 'Strategic Policy FRA';
- 'Strategic Site and Housing Regeneration Area 1 – FRA';
- 'Affordability' (Policy H2);
- 'Housing Quality and Density' (Policy H3);
- 'Meeting Housing Needs' (Policy H4); and
- 'Student Accommodation' (Policy H6).

5.6 RBKC's Core Strategy (2010):

- 'Earl's Court' (Policy CP10 and associated Vision);
- 'Earl's Court Exhibition Centre' (Policy CA7);
- 'Strategic Objective for Diversity of Housing' (CO6);
- 'Housing Targets' (Policy CH1); and
- 'Housing Diversity' (Policy CH2).

Figure 5.3: Photograph of a new housing development at Empire Square, Southwark. Photograph by Ivor Samuels

Estate Regeneration

Key Principle HO1:

The authorities will require a comprehensive approach to the redevelopment of the OA and LBHF will expect comprehensive redevelopment to deliver estate regeneration.

5.7 In 2007, the Government commissioned a study into the 'Future of Social Housing' by Professor John Hills. Many of the findings from this study reflect a national position of residualised social housing with concentrations of deprivation and social problems. Unemployment within the West Kensington and Gibbs Green estates is twice the borough average. Long term unemployment is especially problematic with 40% claiming benefits for longer than 6 months. 12% of the working age population claims Incapacity Benefit compared to a borough average of 6%. Housing Benefits claimants are at around 44% compared to a borough average of 25%. Referrals to both Child and Adult social care are significantly higher than in the rest of the borough. Residents on the estates suffer from a higher standardised mortality rate than the borough average.

5.8 Like many residential estates built in the 1960s and 1970s, the estates also suffer from discontinuous internal roads and poor quality open space which is underused and poorly integrated within the surrounding area. The West Kensington Estate in particular, has large areas of underused communal land that is poorly laid out. This poor layout discourages pedestrian footfall which reduces natural surveillance, which may increase the occurrence and perception of crime.

5.9 Given the development aspirations of adjacent landowners, LBHF have been investigating the potential for the inclusion of the West Kensington and Gibbs Green estates within the wider development proposals. LBHF's Core Strategy (2011), Strategic Site and Housing Regeneration Area – FRA 1 states that "*Regeneration of the West Kensington, Gibbs Green and Registered Provider estates phased over up to 20 years will be considered as part of the comprehensive approach to the opportunity area*". Annex 1 of the Mayor's London Plan identifies that the OA "*presents a significant opportunity for regeneration comprising estate renewal*" and that "*A comprehensive approach should be taken to planning the future of the exhibition complex, the Transport for London Lillie Bridge Road depot, the local authority housing estates and other sites in the vicinity*".

Figure 5.4: Photograph of a street within the West Kensington Estate

Figure 5.5: Photograph of garages within the West Kensington Estate

5.10 With the future of the West Kensington and Gibbs Green estates in mind, LBHF is undertaking a review (known as the 'Estates Regeneration Economic Appraisal') of the economic benefits and disbenefits of the following four principle options:

- Minimum intervention;
- Minimal intervention and in-fill development;
- Comprehensive redevelopment as a standalone estate redevelopment; and
- Comprehensive redevelopment as part of a wider Earl's Court masterplan development.

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5.11 The initial conclusions are that estate redevelopment as part of a wider Earl's Court masterplan development delivers the optimum benefits. LBHF, as landowner and being responsible for the estates as housing authority, has accepted and endorsed the conclusions contained within the Estates Regeneration Economic Appraisal, subject to the outcome of further consultation with local residents and any required consents from the Secretary of State.

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5.12 One of the supporting evidence documents that accompanies this SPD is a Development Capacity Scenarios study. Scenario 1 in this study looks at a development scenario that does not involve the West Kensington and Gibbs Green estates whereas Scenarios 2 and 3 look at comprehensive redevelopment including the estates. A critique of each scenario is included in the study, which demonstrates that including the estates in comprehensive redevelopment has far greater benefits in terms of extending the urban grain, increasing public open space and improving connectivity.

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5.13 The inclusion of the estates as part of a comprehensive phased redevelopment of the OA would provide opportunities for the reprovision of the existing estate housing as part of a wider mixed tenure development. This would foster the creation of more mixed communities, which is a key tenet of Planning Policy Statement 1 on Delivering Sustainable Development. The utilisation of these adjacent sites also provides better opportunities for getting an improved quality of social rented accommodation.

5.14 In consideration of the above, LBHF, as a planning authority, is of the opinion that any approach to comprehensive redevelopment of the OA should include the West Kensington and Gibbs Green housing estates. Planning obligations will be put in place to ensure the delivery of estate redevelopment as part of any comprehensive approach to development in the OA.

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Key Principle HO2:

Any planning application involving the redevelopment of the Gibbs Green and West Kensington housing estates will have to demonstrate that the proposals would not result in any net loss of affordable housing measured by floorspace and unit numbers.

5.15 The Mayor's London Plan (2011) Policy 3.14B states that the loss of housing, including affordable housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. LBHF will also require that there is no net loss in unit numbers, in order to provide comfort to residents who live in a property within the estates, that they will have the opportunity to remain within the OA.

Figure 5.6: Aerial photograph of the Seagrave Road carpark site

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Key Principle HO3:

Any planning application providing affordable units in order to facilitate the reprovision of housing for the residents of the West Kensington and Gibbs Green estate, should be accompanied by an assessment of need. This should demonstrate that any affordable housing being provided will be sufficient in terms of size and adaptation to cater for the needs of residents on the existing estates who have expressed a desire to remain in the area.

5.16 Direct 'like for like' reprovision of the social housing in the Gibbs Green and West Kensington estates would not address current issues of overcrowding and hidden households or necessarily meet the housing needs of existing tenants. LBHF will require any regeneration proposals to provide for the housing needs of the estates' existing tenants and to provide sufficient housing options for those existing leaseholders and freeholders who wish to stay to have the opportunity to purchase an equivalent property (in terms of bedroom numbers) to their existing property. The assessment of need must accompany any planning applications submitted to LBHF.

Equality considerations would need to be considered as part of the assessment of need. Separately, any application proposing redevelopment of the estates or re-housing of residents would need to be accompanied by an Equalities Impact Assessment, which would assess the impact of any proposals against 'protected characteristics' as defined in the Equality Act 2010.

Key Principle HO4:

25% of all new housing on the Seagrave Road site should be social rented and include a mix suitable to facilitate the re-provision of housing for an identified proportion of residents of the West Kensington and Gibbs Green estates.

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5.17 LBHF's Core Strategy (2011) Policy on the OA Strategic Site states that "development proposals for Seagrave Road should provide for the opportunity to deliver approximately 25% of all housing as social rented housing, subject to estate regeneration coming forward, detailed analysis and viability".

5.18 Seagrave Road is currently used as a car park for the Earl's Court Exhibition Centres and is considered suitable for an early phase for redevelopment. It is therefore imperative that a certain quantum of the affordable housing provided on the Seagrave Road site is of a mix that reflects the needs of an identified proportion of the residents of the West Kensington and Gibbs Green estates, having regard to the requirements of Key Principle HO3.

5.19 In addition to this, affordable housing will be required to top up to the 40% affordable housing target identified in LBHF's Core Strategy Policy H2, subject to viability.

Key Principle HO5:

The Phasing Strategy required in Key Principle PS1 (see Phasing and Section 106 Strategy) should demonstrate that the phasing and re-housing for the redevelopment of the West Kensington and Gibbs Green estates minimises disruption to existing residents.

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5.20 The Phasing strategy should seek to provide certainty and clarity of delivery on a phased basis. The strategy should enable the wider regeneration proposals to commence promptly and continue efficiently, with discreet sections of existing housing capable of being replaced and residents relocated with minimum disruption. As part of any estate regeneration programme, residents should only be expected to move once – from their existing property to a new one.

Figure 5Z: Housing within the West Kensington estate

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Tenure Mix

5.21 Policy 3.12A of the Mayor's London Plan (2011) states that *"the maximum reasonable amount of affordable housing should be sought"*, having regard to current and future affordable housing requirements, affordable housing targets, the need to encourage rather than restrain development, the need to provide mixed and balanced communities, the size and type of affordable housing needed in particular locations and the specific circumstances of individual sites.

Key Principle HO6:

In LBHF, 40% of all new housing in the OA should be affordable, subject to viability. The priority will be the replacement of the existing social rented accommodation to meet the needs of the existing residents of the two housing estates. The remainder of the affordable housing should be intermediate or affordable rented.

5.22 LBHF's Core Strategy (2011) Policy H2 states that 40% of residential units on sites with the capacity for ten or more self contained dwellings should be affordable, with a preference for *"all additional affordable housing to be intermediate and affordable rented housing unless a small proportion of new social rented housing is necessary in order to enable proposals for the regeneration of council or housing association estates"*, as is the case in the OA.

Key Principle HO7:

In RBKC, 50% of all gross external residential floorspace above 800sqm should be affordable and provided on site within RBKC, subject to viability. A minimum of 15% of the affordable housing provision should be intermediate, with the remainder being social rented housing.

5.23 RBKC's Core Strategy (2010) states at paragraph 10.3.12 *"Earl's Court must retain the diversity of housing tenure which it currently enjoys. Residential development in Earl's Court must deliver a mix of housing to reflect local and boroughwide need."* The delivery of affordable housing forms part of the Vision for Earl's Court at paragraph 10.2, supported by Policy CP10 and CA7(q). Policy CH2i requires *"developments to provide affordable housing at 50% by floor area on residential floorspace in excess of 800sqm gross external area"*. Where less than 50% is provided it must be demonstrated that this is the maximum reasonable amount of affordable housing through an agreed viability assessment. RBKC Core Strategy (2010) Policy CH2k requires *"affordable housing provision of affordable homes on site where more than 1,200m² of gross external residential floor space is proposed, unless exceptional circumstances exist"*. There is therefore an expectation that the affordable housing provision will be on-site within RBKC. RBKC Core

Strategy (2010) Policy CH2q also requires "that affordable housing includes a minimum of 15% intermediate housing in the Earl's Court ward".

5.24 The Government has recently introduced a new affordable housing tenure, known as Affordable Rent. This tenure is different to social rented and intermediate housing. It is not captured in RBKC's Core Strategy (2010) as it was introduced following the adoption of the Core Strategy. RBKC has recently adopted an interim policy for calculating Affordable Rent contributions in RBKC. This interim policy is a material consideration in the determination of planning applications and is available from RBKC Housing Department.

Deleted: RBKC are currently preparing an interim policy on Affordable Rent that, if adopted, will be a material consideration in the determination of planning applications.¶

Key Principle HO8:

Intermediate housing should provide for a broad range of affordability and tenure types.

5.25 The authorities will expect intermediate products to be targeted at a range of affordabilities, having regard to the requirements of para 3.61 of the Mayor's London Plan (2011), Policy H2 of LBHF's Core Strategy (2011), Policy CO6, Policy CH2r and para 35.3.14 of RBKC's Core Strategy (2010). Any intermediate housing will be expected to cover a variety of intermediate products, including shared equity, key worker, discounted market sale/rent and shared ownership, with a particular focus on products that allow for ownership and access to the property ladder.

Key Principle HO9:

To ensure diversity of housing and the delivery of a balanced community, the affordable housing must be tenure blind in terms of the external appearance of the buildings, entrance arrangements and amenity. Any affordable housing should be distributed by building or by block throughout the OA.

5.26 The Mayor's London Plan (2011) Policy 3.5 states that "*Housing developments should be of the highest quality internally, externally and in relation to their context.*" Para 3.76 of the Mayor's London Plan (2011) and para 1.3.13 of the [Mayor's draft Housing SPG \(2011\)](#), state that schemes should be designed so that all affordable housing units have the same external appearance and entrance arrangements as the private housing.

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5.27 Both LBHF's and RBKC's Core Strategies require affordable housing and market housing to be integrated in any development and to have the same external appearance (RBKC Policy CH2n and LBHF para 9.30). Furthermore, RBKC's Core Strategy (2010) Policy CH2 requires the affordable and market housing to have equivalent amenity in relation to factors including views, daylight, noise and proximity to open space, playspace, community facilities and shops.

Key Principle HO10:

The authorities will require that any detailed or reserved matters applications for each phase of the development should include an Affordable Housing Plan, which must set out the affordability, location, tenure mix and unit size of any proposed affordable housing within the phase.

5.28 In order to deliver Key Principle HO9 and ensure that any redevelopment of the OA delivers mixed and diverse communities, the authorities will expect any detailed or reserved matters applicant to submit an Affordable Housing Plan. This would contain details on the affordability, tenure mix, unit size and spread of different housing tenures through each phase of development. The authorities will look to ensure that as much as possible, affordable tenures are integrated with market tenures, as per the requirements of HO9.

Key Principle HO11:

The authorities will control the affordability of any affordable housing.

5.29 The authorities will consider mechanisms to ensure that the affordability of affordable housing costs are not compromised by excessively high service charges or maintenance rates. Housing should be designed to provide for ease of maintenance for low cost home ownership. Providing buildings or blocks of exclusively affordable homes, as outlined in Key Principle HO9, will help to minimise service charges for residents. Further it will assist with tenancy management and internal building management. This also allows for single decants and importantly enables communities to stay together. Applicants will be expected to provide information on the 'weekly cost to occupier' of the proposed affordable units, including realistic and affordable service charges. For intermediate housing, annual housing costs (including service charge) should be no greater than 40% of net household income.

Housing Sizes

5.30 The Mayor's London Plan (2011) Policy 3.8 states that "Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments". LBHF's Core Strategy (2011) Strategic Objective 2 and Policy H4 place particular emphasis on the need for family sized housing. RBKC's Core Strategy (2010) Policy CH2a requires "new residential developments to include a mix of types, tenures and sizes of homes to reflect the varying needs of the borough, taking into account the characteristics of the site and current evidence in relation to housing need". Paragraph 35.3.10 sets out indicative house sizes (see below) but acknowledges that it would be unrealistic to expect all housing schemes to comprise dwellings built to these exact ratios.

Social Rented Housing Sizes

Key Principle HO12:

In LBHF, the social rented housing mix should mirror that identified in the Assessment of Need, produced in accordance with Key Principle HO3. In RBKC, the social rented housing mix should aim for a minimum of 55% 3 and 4 bed with the remainder being 1 and 2 bed.

5.31 In LBHF, the size of the units required to enable the regeneration of existing housing estate properties will be dependent on the assessment of need. This issue is covered in more detail in the preceding section on estate regeneration.

5.32 RBKC has a significant shortage of larger social rented properties. Paragraph 35.3.10 of RBKC's Core Strategy (2010) identifies an ideal mix of 45% 1 and 2 bed and 55% 3 and 4 bed. Development proposals should also consider the needs of extended families.

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Intermediate Housing Sizes

Key Principle HO13:

The intermediate housing mix must have regard to the local and strategic housing need assessments and the advice of the boroughs' and GLA's Housing Departments.

5.33 LBHF's policy for intermediate housing mix is based on the Mayor's Housing Strategy (2010) (Policy 1.1C) which states that "...by 2011, 16% of intermediate homes should have three bedrooms or more". The split between one bed and two bed intermediate properties is not set within the Mayor's Housing Strategy (2010), but LBHF will expect a significant proportion of the intermediate properties to be two bed, which reflects the needs and aspirations of people on the H&F Homebuy register.

5.34 RBKC has a shortage of intermediate homes, but because of land values, the preference is for smaller properties, as larger homes become 'unaffordable' to the intermediate housing market. Paragraph 35.3.10 of RBKC's Core Strategy (2010) identifies an ideal mix as 70% 1 and 2 bed, and 30% 3 and 4 bed. Intermediate products should be offered at the 'usefully affordable' point.

Market Housing Sizes

Key Principle HO14:

Development proposals within the OA will be expected to provide a range of market housing unit sizes, especially the provision of larger family sized units (3 bedrooms or more), having regard to the London Strategic Housing Market Assessment 2008 and both LBHF and RBKC Core Strategies.

5.35 The London Strategic Housing Market Assessment 2008 shows the market housing demand to be 39% 1 bed, 47% 2 bed and 14% 3 bed. Para 35.3.10 of RBKC's Core Strategy (2010) shows the demand for market housing in RBKC over the next 20 years to be 20% 1 and 2 bed units and 80% 3 and 4 bed units. Therefore, on the basis of this evidence, both LBHF and RBKC would expect to see a mix of market unit sizes with a significant quantity of larger family sized units (3 bedrooms or more) and also consider the needs of extended families.

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Alternative Accommodation

Key Principle HO15:

Any application for comprehensive development should provide alternative housing types catering specifically for the needs of the elderly, vulnerable groups and students.

5.36 In addition to conventional residential accommodation, a variety of other accommodation offers should be provided through any redevelopment proposals, such as student accommodation and Extra Care Housing. This is supported by Policy CH2 of RBKC's Core Strategy (2010), which "*encourages extra care housing, particularly in the south of RBKC*" and by Policies H4 and H6 in LBHF's Core Strategy (2011), which support applications for housing for people who need care and support and applications for student housing in the OA respectively. Any older people's housing should be provided on the same basis of affordable to market housing as set out in Key Principles HO6 And HO7.

Housing Space Standards

Key Principle HO16:

All new housing should accord with the standards in the Mayor's London Plan (2011) and the [Mayor's draft Housing SPG \(2011\)](#).

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5.37 The Mayor's London Plan (2011) includes minimum space among other design standards for all new housing (Policy 3.5). [The Mayor's draft Housing SPG \(2011\)](#), expounds Policy 3.5 of the Mayor's London Plan (2011) and reflects aspects of the Mayor's Housing Design Guide (2009). Para 35.3.13 of RBKC's Core Strategy (2010) states that the standards in the Mayor of London's Housing Design Guide "will inform requirements within the Borough".

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5.38 Any development proposals within the OA will need to have regard to the [Mayor's draft Housing SPG \(2011\)](#) standards, including the minimum amount of internal floor area (GIA). Table 3.3 of the Mayor's London Plan (2011) is shown here in Table 5.1. In addition to this, wheelchair accessible dwellings in RBKC will need to meet the minimum floorspace requirements in the RBKC Access Design Guide, 2010.

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Table 5.1: Minimum internal floor areas as set out in Table 3.3 in the Mayor's London Plan (2011)

5.39 Whilst it is noted that these are minimum standards, there is an expectation that where they are exceeded, the vast majority of dwellings will not be greatly in excess of these standards. There is market demand for exceptionally large dwellings, particularly in Kensington. It is fair that some dwellings are provided for this market. However, the over-riding priority is to provide dwellings of a size that meet the expectations of the vast majority of Londoners, to contribute to addressing the chronic shortage of ordinary-sized housing across London.

Amenity Space

Key Principle HO17:

All new homes must be carefully designed and laid out to have satisfactory access to gardens or other outdoor amenity space. Family dwellings at ground or podium levels should have access to private gardens. Balconies may be provided where appropriate subject to design, location and context (e.g. overlooking shared private space).

5.40 The Mayor's draft Housing SPG (2011), standard 4.10.1 sets out a requirement for a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm to be provided for each individual occupant.

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5.41 The LBHF Unitary Development Plan (2007) requires residential accommodation at ground floor level to provide 36sqm amenity space for family units and 14sqm for non-family units. It is recognised that this standard may not be deliverable in higher density developments such as in this OA, although every effort should be made to achieve it. LBHF's Core Strategy (2011) Policy H3 requires gardens and shared amenity space to be included within development proposals. RBKC's Core Strategy (2010) Policy CH2 requires "*housing schemes to include outdoor amenity space*".

Accessible Housing

Key Principle HO18:

10% of residential units in each borough must be wheelchair accessible.

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Key Principle HO19:

All residential units must be built to Lifetime Homes standards.

5.42 Both boroughs' Core Strategies require 10% of residential units to be wheelchair accessible and all new build dwellings to be built to "Lifetime Homes" standards (Policy CH2 in RBKC's Core Strategy (2010) and Policy H4 in LBHF's Core Strategy (2011)).

5.43 Within the West Kensington and Gibbs Green housing estates there are a number of disabled residents who live in wheelchair accessible units. Some of these units have been adapted to provide for particular disability needs, but other units have not been adapted because the existing home is not practically capable of adaptation.

5.44 Where a continued need exists, or indeed, where there is a new need arising from the estate residents, the priority in terms of accessible housing in LBHF should be the provision of the appropriate amount of wheelchair and adapted units in order to cater for the needs of these existing estate residents.

5.45 Beyond catering for the needs of the estate residents, there should be further provision of wheelchair accessible units to top up the overall provision across the scheme so that in total, wheelchair accessible dwellings constructed total at least 10% of all new residential dwellings in each borough. This top-up provision should be spread evenly across tenures, and across all Extra Care units constructed in the OA.

5.46 Further advice on achieving Lifetime Homes standards is set out in LBHF's Access For All SPD and RBKC's Access Design Guide SPD.

Figure 5.8: Photograph of a new housing development at St. Andrews, Bromley by Bow. Photograph by A&M Photography

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