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From: Daniel Blaney <[REDACTED]>
Sent: 20 September 2024 12:12
To: Local Plan
Cc: [REDACTED]
Subject: Daniel Blaney submission to Local Plan consultation closes 5pm today

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Submissions to September 2024 consultation on the local plan from Daniel Blaney, former councillor and former chair of Newham's Strategic Development Committee.

The Local Plan and the Climate Emergency

I am concerned that the regulation 19 draft plan is insufficiently robust is setting down its statutory requirements cited relation to climate change. Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by Section 182 of the Planning Act 2008, states: 'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' There is clear policy guidance in the NPPF and professional guidance published by the RPTI to ensure its compliance with this requirement. I am alarmed by the following sentence in the Regulation 19 Viability Report: "in some cases there may be a need to balance the net zero carbon objective against other plan requirements," which appears contrary to the guidance for ensuring compliance with the climate change objectives set out in primary legislation, and which could be subject to legal challenge.

The urgent need for more genuinely affordable housing

The government is continuing to consult on changes to the National Planning Policy Framework. It is perverse to close this consultation on ensuring the new stage of the Local Plan Review process is legally watertight while the government is consulting on changes to national policy, in particular the following:

"We expect that many areas will give priority to Social Rent in the affordable housing mix they seek, in line with their local needs, and this is something we strongly support, but we will not be prescriptive; it is for local leaders to determine the balance that meets the needs of their communities."

This is enormously helpful to the London Borough of Newham which already states that it seeks to give to priority to Social Rent in its Regulation 19 draft plan. However, the evidence to support that may need to be measured differently to aide the stated

justification of the policy - see “Chapter 4 – A new Standard Method for assessing housing needs” of the NPPF consultation, still live. Once the national consultation has closed and assuming the new government’s projection of urgency in this area is reflected in the speed of further policy announcements, it may be that the draft Newham Local Plan will punch below its weight on the issue of Social Rent before it is even adopted, having followed an outdated methodology for assessing housing need. The Local Plan should be amended to the benefit of the local and national priority now given to Social Rent, to ensure it is technically accurate at the time of adoption. In the circumstances, the timing of this Regulation 19 consultation is perverse, and the local process should be paused pending elaboration of the timing of the new Government’s policy approach. This is the best option for maximising homes for Social Rent, and compliance with the national legal framework.

Rick Roberts Way and related sites

Given the local and emerging national priority given to Social Rent, I am disappointed with the lack of explicit reference to higher affordable housing requirements in the site allocation for Rick Roberts Way and other areas following Stratford Waterfront consent (now known as East Bank). The UU requires the provision of 50% affordable housing, and that Rick Roberts Way is to provide the required number of affordable habitable rooms and tenure split to achieve the portfolio requirements. The UU also requires the delivery of a proportion of affordable housing prior to market sale units and the use of reasonable endeavours to pepper pot affordable housing within each development.

The contents of this UU should be explicitly referenced in the local plan to ensure affordable housing previously promised by an LLDC developer via s106 is delivered. In practical terms it means affordable housing should be much more than 50% of homes delivered on the RRW site. This must be written into the site allocation for Rick Roberts Way, to demonstrate the planning authority’s overarching priority of maximising homes for Social Rent.

Studios

I am alarmed by the insertion of new wording which permits developers to propose studio flats as acceptable housing in new developments. This is an unacceptable form of housing tenure in Newham, and planning officers and elected members have worked together successfully to resist studios in recent years. I regard it as a complete overhaul of policy that should not be sneaked in through this plan writing process. I am concerned there has been insufficient consultation on this matter, given the restricted nature of the Regulation 19 consultation and its purposes.

Daniel Blaney, 20 September 2024