

Pauline Butcher
Programme Officer

22 May 2017

Our ref: NTH/STH/

Dear Sir/Madam,

**Further Representations to the Hammersmith and Fulham Local Plan
Stanhope PLC**

Gerald Eve LLP is instructed, on behalf of Stanhope PLC, to submit further formal representations to the London Borough of Hammersmith and Fulham ('the Council') in relation to the schedule of changes and comments published by the Council in response to the original representations.

Housing

Policy HO1 – Housing Supply

The removal of (e) is supported.

We note that a response was not provided on the suggestion of a 'location specific affordable housing policy'. Given the variations in housing stock composition throughout the borough, we are of the view that area specific policies should be considered in order to maximise the most appropriate forms of affordable housing in particular areas.

The additional paragraph 6.9 (MC69) regarding the provision of Build to Rent in policy is supported. However, we are of the view that the GLA requirement to implement long term covenants of at least 15 years could be restrictive. The recent DCLG consultation suggested a more flexible approach including a claw back mechanism, which is secured in the S106. This arrangement could give certainty to investors as to the terms under which, if it proves necessary, a Build to Rent scheme could be converted to other tenures.

Policy H03 – Affordable Housing

The reference to “separate service cores” maybe being necessary between tenures is supported and will ensure that the affordable housing element of a scheme can be easily managed. It will also enable service charges to be controlled and affordability achieved.

The point was that the inclusion of both Social and Affordable Rents in the policy is supported and provides flexibility at the pre-app and application stages for negotiations with the Housing and Planning Officers. For example, on the composition of the affordable offer including affordability and rental levels.

Policy H04 – Housing Quality and Design

Noted and additional text supported

Policy H05 – Housing Mix

There are still issues concerning the provision and subsequent affordability of the 3 bed Intermediate units, particularly with the maximum income threshold requirements set by the borough. The long term delivery of this type of unit and an RPs willingness to acquire them increases the level of risk for the scheme.

Policy HO11 - Noted

Viability Protocol – Appendix 9

Point 3 Benchmarking.

Where there is such a limited definition of Benchmark Land Value, this could be viewed as conflicting with the NPPF unless the “+” bit of the “EUV +” can be used to argue a range of other approaches.

We trust these comments will be received in the constructive spirit that they are intended and we look forward to discussing these with your officers in due course.

Yours faithfully

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