



**City of Westminster**

# City Plan Sub-Committee Report

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<b>Title:</b>	City Plan housing policies
<b>Report of:</b>	Director of Policy, Performance and Communications
<b>Cabinet Member Portfolio:</b>	Built Environment
<b>Wards Affected:</b>	All
<b>City for All</b>	City of Aspiration: Supporting the building of more affordable homes
<b>Key Decision:</b>	No
<b>Financial Summary:</b>	None
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## **1.0 Executive Summary**

- 1.0 This paper explains some of the current general issues around housing in Westminster as a basis for discussion about the future direction of strategic planning policy. It explains:
- the changes introduced by the Housing and Planning Act;
  - the emerging details about how the Mayor of London intends to implement his housing policies and change to the London Plan;
  - how housing targets are arrived at and the difficulties now faced in meeting objectively assessed needs for housing;
  - changes to housing design requirements i.e. the removal of Lifetime Homes standards and replacement with building regulations and how they will affect the City Council's housing policies; and
  - how all these issues have impacted on the timetable for revisions to the City Plan.

## **2.0 Recommendation**

- 2.1 That members consider the housing issues explained below and debate the issues, raising any concerns that it is considered that changes to the City Plan policies should address.

## **3.0 The Housing and Planning Act 2016**

- 3.1 The Housing and Planning Act 2016 received Royal Assent in May. Among its stated aims are boosting housebuilding and increasing home ownership.
- 3.2 Among its provisions is the introduction of a new affordable housing product aimed at promoting homeownership among younger people. A Starter Home is defined in the Act as a new dwelling to be made available for sale to first time buyers, between the ages of 24 and 40 and sold at a 20% discount of the market value. There will be a price cap in Greater London of £450,000.
- 3.3 The Act imposes a general duty on local authorities to promote Starter Homes through their planning functions (in determining planning applications and in drawing up their local plan). There is a power for ministers to set a "starter home requirement" by regulations, requiring that a proportion of dwellings are starter homes of this kind if planning permission is to be granted. They will be secured by local planning authorities through section 106 agreements. Because delivery will be a requirement of the grant of planning permission (subject to some exemptions and a narrowly defined viability exemption) it will not be negotiable, and will have first call on the value in development that could fund affordable housing. The Government has recently consulted on proposals to set this requirement at 20% of units on residential schemes of 10 units or 0.5 hectares or more. The 2016 Act also provides for payment of commuted sums i.e. enabling Starter Homes to be delivered off site. Again the detail of this is to be set out in regulations.
- 3.4 The "discount" is to be funded by the developer. Ministers have indicated that given this, section 106 contributions for affordable housing and infrastructure should not be sought from Starter Homes and that they will be exempt from the Community Infrastructure Levy. The Government has proposed changes to the NPPF to make discounted market sale products such as Starter Homes a form of affordable housing (in addition to social and intermediate housing).

- 3.5 The implications of the introduction of starter homes in Westminster are difficult to assess until the final scope of the requirement is clearer and the Mayor's role in delivery is clarified (this is dealt with in more detail in section 4). In particular, it is not clear how they will work in high value areas, where the majority of properties are well above the £450,000 cap – or how the market will react to them. Taken with the viability issues that are already a major factor in Westminster, they are likely to have major effects on future delivery of more “conventional” forms of affordable housing (this is a point that the council's response to the Government's proposals has made strongly) – as property consultants Savills have expressed the view that they are *“likely to result in fewer homes delivered for what is currently classified as an affordable tenure”*. Savills consider that Starter Homes may generate no more land value than that of “traditional” affordable housing, particularly in high value areas where to reach the price cap a higher “discount” would be required. In addition, “traditional” affordable housing is typically sold in bulk to housing associations, thereby securing developers' cash flow; this may be less likely to happen with Starter Homes and this could mean that land dedicated to them may return lower values. In short, they conclude that this initiative may have significant effects on development viability that could squeeze other forms of affordable housing and affect overall levels of delivery.
- 3.6 Starter Homes are unlikely to be accessible to the majority of customers on the Council's intermediate housing list – 70% of households needing a one bedroom property have incomes of £40,000 or less. There will also be no “local connection” requirement meaning that Westminster residents will not have priority for starter homes provided here (or funded through commuted sums raised here).
- 3.7 Once Government has fixed the final requirements and the approach that the Mayor may take in terms of the range and delivery of starter homes in Greater London is clearer, there will be a need to revisit the council's evidence base about housing need, and to reassess its affordable housing policy in the light of starter homes having a first call on any value in a scheme available to fund affordable housing.
- 3.8 The 2016 Act also extends the right to buy to housing association tenants. This is to be funded through payments made by local authorities in respect of the proceeds of selling high value council homes when they fall vacant. The Act requires “one for one” replacement of homes sold under the right to buy, although they do not have to be built in the same place or provided on the same tenure as those sold. It also requires replacement of high value council voids on a two for one basis in Greater London and it has been indicated that the sums paid by housing authorities to the Treasury will be set at a level allowing the cost of this to be met. The replacements can be provided by the local housing authority concerned or by the Mayor of London on its behalf; there is no requirement that replacements are built in the same place as the unit sold.
- 3.9 **Do Members agree that a review of the council's evidence base for housing policies (particularly affordable housing) should be undertaken once the Housing and Planning Act Regulations have been published?**

## 4.0 New Mayoral Policies

- 4.1 Since his election as Mayor of London, Sadiq Khan has been in discussion with boroughs and others regarding implementation of the housing policies in his manifesto and, in particular, arrangements that will be put in place to increase significantly housing delivery across all tenures. It is likely that these discussions will lead to a case put to ministers for additional powers and flexibilities for London to help improve development and, potentially, to new delivery arrangements in the capital to enable provision of new housing – particularly to meet the additional requirement to replace housing disposed of in connection with the Right to Buy and Starter Homes provisions of the 2016 Act.
- 4.2 We will also have to have regard to changes in Mayoral planning policies. The previous Mayor had already started a review of the London Plan, particularly to take account of emerging evidence about housing need and the importance of driving up delivery. It is likely that further details about the programme for London Plan revision and the areas which will change will become available over the next few months. In the meantime work is already underway on assembling updated evidence to support policy; including a new London Strategic Housing Land Availability Assessment (the importance of this is explained in section 5 of this report).
- 4.3 Among the issues being discussed with/by the Mayor are Londonwide approaches to housing delivery and addressing issues like homelessness. These issues fit well with the direction the Council proposed to take in our draft Housing Strategy - in particular greater flexibility to use resources generated in Westminster to fund affordable homes in places beyond our boundaries where we can maximise delivery. It is also likely that there will be discussions about wider financial flexibilities around the Housing Revenue Account and making it easier to reinvest right to buy and other capital receipts.
- 4.4 Changes to Mayoral policy and any arrangements he puts in place to deliver housing across London will have a significant impact on the City Council's planning policies and will be addressed in the second round of revisions referred to in section 8 of this report.

## 5.0 Housing Delivery Targets

- 5.1 The starting point in developing strategic planning policies on housing is the requirement set by national government in the National Planning Policy Framework (NPPF) that local planning authorities should *“ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”*. This section of the report explains how the Mayor and Westminster (and other London boroughs) develop policies for:
- The **total amount of housing** that should be delivered;
  - within that, **the amount of affordable housing** that should be delivered; and
  - within *that* the proportions of **different types of affordable housing** that should be delivered.
- 5.2 In the NPPF government sets the starting point for boroughs as seeking to meet total housing need in their area for both affordable and market housing. But the other policies in the NPPF also have to be taken into account – for example how much is physically deliverable; the resources available to fund affordable housing; policies on sustainable development; meeting the development needs of business and economic development; and

protection of the historic environment. In particular, the NPPF says that local plans should be aspirational, but realistic and deliverable, with particular reference to the effects policies might have on development viability across the authority's area. The Housing and Planning Act and subsequent Regulations regarding starter homes are likely to cause significant difficulties in local authorities meeting their objectively assessed needs – primarily because there is no local requirement for allocating starter homes, but also because the starter homes requirement is likely to squeeze out any finances available for the delivery of other forms of affordable housing.

5.3 The NPPF also says that planning policies should draw on evidence in two documents:

- A **Strategic Housing Market Assessment (SHMA)** identifying each area's housing needs - the scale and mix of housing the area is likely to need given likely changes in population (including migration), breaking this down by types of housing (including affordable housing and provision for groups like families with children, older people, people with disabilities and service families).
- A **Strategic Housing Land Availability Assessment (SHLAA)** identifying the amount of land that will realistically be available, viable and developable to meet the identified need for housing.

5.4 We also have to take account of the Mayor of London's "**London Plan**". This sets strategic targets for housing delivery with which Westminster's own City Plan legally has to be "in general conformity". These include overall targets for each London borough for delivery of all types of housing. It also requires boroughs to set an overall target for affordable housing (as a number or a percentage of all housing delivered) and separate targets for social/affordable rented and for intermediate housing.

*London Plan housing targets*

5.5 The most recent London Plan targets were formally published in March 2015 drawing on London-wide evidence of need and land availability. The targets are:

- For an annual average of at least 42,000 additional homes across London. The target for Westminster 2015-2025 is a minimum of 10,677 homes (giving an annual benchmark of 1,068 homes).
- For at least 17,000 more affordable homes per year London-wide.
- For 60% of the affordable housing provision to be social/affordable rent and 40% for intermediate rent or sale.

5.6 The London SHMA sets out evidence about London-wide housing need looking forward to 2035, drawing on the demographic and economic trends in London and developments in the housing market. There is particular uncertainty about future population and household growth at the moment, partly because of the importance of domestic and international migration in London (the latter which may, of course, be affected over the long term by 'Brexit'), and partly because of the unpredictability of the rate at which new households will grow. In recent years the rate at which people have moved into London from the rest of the UK has increased, while out-migration has decreased (net domestic out-migration fell from 100,000 pa at the start of the 2000s to 50,000 in 2012); while there are signs that out-migration has started to pick up again as the economy has recovered the trend is difficult to predict.

5.7 This uncertainty meant that the Mayor looked at three different population scenarios in developing his most recent targets, using the central one to support the London Plan. This shows London's population growing to around 10.1 million by 2036 (an annual increase of

76,000 pa), with growth in the number of households by around 39,500 pa. Taking account of the need to clear backlog need, it estimates an annual housing need in London of 48,841 homes which includes need for 25,624 affordable units of affordable housing.

- 5.8 The London SHLAA is prepared by the GLA in discussion with each London borough. It establishes how much land is available for housing in London and how much can be built on each identified site. It covers sites of 0.25 hectares and larger and makes assumptions about the numbers of units that can be provided on smaller sites. Sites were identified by the Greater London Authority, by boroughs and by landowners and developers in response to a public “call for sites”. For each, potential constraints on development are identified and assumptions made about the timescale over which housing will be delivered. Housing potential is estimated based on public transport accessibility, London Plan standards of development density, London and local policy constraints and development viability.
- 5.9 Taking account of large sites, small sites, returning long-term vacant housing to use and student non-self-contained accommodation this found total capacity across London for 423,887 new units 2015-25. For Westminster the figures were:

Large Sites	4,960
Small Sites	4,667
Long-term vacants returning to use	1,050
Non-self-contained student accommodation	0
<b>TOTAL</b>	<b>10,677</b>

- 5.10 The London Plan housing targets are based on developing all of the sites identified in the London SHLAA. This approach, recognising the very high level of demand compared with the availability of land to meet it, has been taken since the first London Plan was published in 2004. A new SHLAA is currently being prepared by the GLA and new estimates of housing capacity are expected to be released next year, however it is very unclear at this early stage how ‘Brexit’ will impact on in/out migration from London.

*Setting targets for Westminster*

- 5.11 Westminster’s housing delivery policies are based on the London SHLAA and housing market assessments commissioned by the City Council. Our housing need evidence base is drawn from a [Local Housing Market Assessment \(LHMA\)](#) (2014) – which followed the approach set out in national planning guidance – and a [Housing Market Analysis](#) (also 2014) which has taken account of factors like the importance of migration and the effect this has on demand for housing that make the approach recommended by Government nationally less effective in Westminster. It also provided a “sense check” of the LHMA findings against housing market trends like demand for homes of different sizes. These documents both used the Mayor’s “Central” population projections – for Westminster an annual increase of 740 households<sup>1</sup> between 2011-2036 which translates into a need for 1,100 new dwellings each year 2011-2016 and 800 pa 2016-21 (these include provision making up for past under-provision). The total need for affordable housing is 420 units pa. By comparison, over the past 10 years an annual average of 764 new homes have been completed in Westminster (excluding non-self-contained units and vacant homes returned to use); of these 183 (24%) have been affordable. Changes at a national level to affordable housing policy will affect how far Westminster is able to meet this need.

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<sup>1</sup> This is a population projection which is not related to the estimates for housing capacity derived from the Strategic Housing Land Availability Assessment from which the housing target of 1,068 units pa is derived.

- 5.12 There is a range of factors other than need that have to be taken into account in going on to set targets. In addition to viability and the resources likely to be available to fund affordable housing, account has to be taken of the other demands on land that the council has to plan for – such as the additional 655,000 sqm of office space that employment growth will require and the 604,000 sqm of comparison retail space likely to be required in the West End. Policy considerations like international, regional and local heritage designations (including the Westminster world heritage site and protected views of and across the city) also have to be taken into account.
- 5.13 For affordable housing, need is based on an assessment of how many people will be unable to afford to meet their housing needs in the market having regard to prices and incomes and draws on evidence sources like the Council’s housing waiting list<sup>2</sup>. The current stock of affordable homes<sup>3</sup> is subtracted from this figure to give the future requirement. The Housing Market Analysis suggested a total need for affordable housing of 422 units per year for the next twenty years, split between the types of affordable housing – 180 units of social housing pa and 240 intermediate. National guidance requires that in setting targets the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments.
- 5.14 Taking all of this into account the housing targets that are being considered to underpin both the Housing Strategy and the City Plan are:
- The annual overall target of at least 1,068 set by the London Plan.
  - For affordable housing, given current levels of funding (and likely future constraints) and the high value of land, the 250 pa target included in the draft Housing Strategy. This represents a 37% increase over historic delivery. However this target will need to be reviewed in light of the Housing and Planning Act requirements e.g. for starter homes.
- 5.15 Dealing specifically with affordable housing, the NPPF defines the types of housing that can be treated as “affordable” for planning purposes. These are available to different groups of eligible households defined by the council with regard to local incomes and house prices:
- Social rented housing, for which rents are set nationally
  - Affordable rented housing, intended to be let to households eligible for social rented housing at rents not more than 80% of local market rents.
  - Intermediate housing, for sale or rent, provided at a cost higher than social rent but lower than market levels.
  - The Government is considering adding ‘starter homes’ to this definition (see section 3).
- 5.16 It is because these types of housing are aimed at (and suitable for) different types of household with distinct housing needs that separate targets are set for social/affordable rented housing (aimed primarily at those on the lowest incomes or benefits) and intermediate (currently aimed at households with annual incomes of £18,000-£66,000 (or £80,000 for family homes)). The Mayor’s London Plan (Policy 3.11) requires boroughs to set overall

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<sup>2</sup> The starter homes requirement will add a new dimension to how housing need is assessed – particularly given the lack of a local connection test, so need and demand for starter homes in Westminster could come from across London, or even further afield.

<sup>3</sup> Sale of higher value voids of council stock will impact upon this calculation in future, although we await detail from the forthcoming Housing and Planning Act Regulations.

affordable housing targets and separate ones for social/affordable rented housing and intermediate.

- 5.17 One of the issues that the council has put forward both in consultation on the City Plan and its draft Housing Strategy is to increase the proportion of intermediate housing in new housing developments from 40% to 60%. This was based on the independent assessment of Westminster's housing market in the Market Housing Assessment (HMA). The independent HMA explains that the intermediate tenure currently makes up just 1% of all households in Westminster (compared to 26% social rent) and that there is a demand for 1,300 intermediate homes over the next five years (compared to 1,180 social homes over the next five years). There are 4,470 applicants on the Waiting List and 3,769 on the Intermediate Housing Register.
- 5.18 The HMA pointed out that given the funding arrangements in place at the time delivery on a scale necessary to meet identified need for social and intermediate housing was impractical, while stressing the need to maximise delivery of all types of affordable housing. It also highlighted the need to address the broad range of need for housing in Westminster, including low to middle income households. Statutory responsibilities the council has to house certain types of household in need in the social sector means that there is limited scope to consider any other type of housing need through social rented housing. The intermediate sector, on the other hand, provides greater flexibility over the type of household which can be offered a property. In particular, it would allow the council to help households on lower incomes - including people vital to running the city's businesses and public services – who are ineligible for social housing and would otherwise not be able to live in Westminster. Given the rough equivalence in need for social housing and demand for intermediate, and the wide difference in the supply of each, it suggested that increasing the amount of new intermediate housing coming forward would be a pragmatic response.
- 5.19 In the past ten years 24% of housing completions in Westminster have been affordable (as defined in the NPPF). If the overall housing target of 1,068 units per year is achieved and 24% is affordable this would result in 256 new affordable units being built each year. If we require 60% of these new affordable homes to be social this would result in 154 new social homes compared to 102 intermediate homes (40% of all new affordable units). If, as the Housing Strategy suggested, the ratio were to be reversed, so 60% of all new affordable units were required to be intermediate then this would mean that 154 homes would be intermediate and 102 social – so there is a potential difference of just 52 units between the two tenures. This approach was proposed in both the City Plan consultation booklet on affordable housing (2015) and in the Council's draft Housing Strategy (2015).
- 5.20 The proposal to modify the ratio in this way received a large amount of support from consultees who responded to these proposals. Consultees recognised the high demand for intermediate housing and the benefits increasing this tenure can bring to Westminster such as allowing low paid workers to live in the city, creating diversity of residents, benefits to the local economy and improved funding for affordable schemes.
- 5.21 It is unclear at this stage precisely how far the changes being made through the 2016 Act will affect the council's housing evidence base and require reconsideration of the policy approach taken so far. These are issues being kept under review by officers and **may be the subject of future presentations to the Sub-Committee if Members feel this would be helpful.**



## **6.0 Housing Design Standards**

- 6.1 The Government has also brought forward major changes to the way housing design standards (such as standards dealing with space, energy efficiency, accessibility and security) are dealt with through the development process, particularly to reduce the number of different design standards adopted by local planning authorities. In general these have been based on moving requirements from the planning system to the building regulation one.
- 6.2 in 2015 the Lifetime Homes Standards were replaced by government with a new set of standards which now form part of Building Regulations. These included nationally described space standards and regulations for access. They are not obligatory, but can be adopted by local authorities if there is sufficient evidence to justify it.
- 6.3 Building Regulation Part M (4)2 is concerned with ensuring dwellings are 'accessible and adaptable', Building Regulation Part M (4)3 is concerned with 'wheelchair user dwellings' and sets out requirements for dwellings to be wheelchair accessible or easily adaptable to residents who are wheelchair users.
- 6.4 A development plan cannot require that both M4 (2) and M4 (3) are applied to the same dwelling. Therefore when the London Plan underwent a minor alteration to include the new Building Regulations and space standards last year, the requirements set out in policy 3.8 are for 90% of dwellings to meet requirement M4(2) and 10% to meet M4(3). Previously 10% of dwellings were expected to be suitable for wheelchair users.
- 6.5 The Minor Alterations to the London Plan also adopted the nationally described space standards which are not that dissimilar from the space standards that existed already in the London Plan, and the policy allows for a departure from the standards in exceptional circumstances where the quality of the design is extremely high.
- 6.6 It is the intention of the Council to also adopt these new standards within the 'main revision' to the City Plan to ensure the quality of new housing being delivered is maintained and to ensure general conformity of Westminster's City Plan with the London Plan.

## **7.0 Non-self contained housing**

- 7.1 Another issue that officers are considering is the role that new "co-living" housing products being brought forward by the market might play in helping meet part of Westminster's housing needs. These typically comprise comparatively small bedsitting rooms and more generous communal space (sometimes including workspaces) and facilities. They are typically aimed at young professionals. Developments of this kind are becoming increasingly common in different parts of London (a recent example is a development by a company called "The Collective" in Old Oak). There has been considerable interest by developers in taking this sort of development forward in Westminster.
- 7.2 These products raise a number of planning policy issues. The living accommodation is typically smaller than the space standards set for self-contained housing in the London Plan and this means that ensuring a very high quality of design and finish is particularly important. Management arrangements need to ensure amenity impacts (and concerns of local residents about these) are minimised, with mechanisms to ensure arrangements to

deal with these issues are kept up over time and through changes in ownership. Consideration would also have to be given to the approach that would be taken to car parking both for residents and operational needs. In policy terms the approach would depend on the use and location (in particular, the public transport accessibility of the site). Cycle parking would also need to be considered.

- 7.3 These products do not themselves fall within the definition of affordable housing. Consideration would also have to be given to how they should be treated in terms of the Council's policies for securing affordable housing from new development.

## **8.0 City Plan Revisions**

- 8.1 As Members are aware Westminster's City Plan is undergoing a series of topic-based revisions. The most recently adopted is the Basements and Mixed Use Revision. The latter updated the housing targets to bring it in line with the new target agreed with the London Plan explained earlier in this report. However it did not introduce any new development management policies for housing or alter any of the existing strategic housing policies.

- 8.2 The council has consulted informally on changes to the detail of planning policy on housing issues through two booklets dealing with:
- Housing need, quality and design (published in 2014)
  - Affordable housing (published in 2015)

These booklets are attached as annexes 1 and 2 to this report respectively.

- 8.3 The housing policies in Westminster's City Plan will need to change to meet new requirements in light of the new legislation and the emerging policies of the Mayor. There is still considerable uncertainty regarding what these new requirements will be exactly as we await detailed regulations to be published (expected later in the year).

- 8.4 There is a need to ensure that policy is as up-to-date as possible – if it isn't, there is the risk that it will be given increasingly little weight in planning appeals. On the other hand, as explained earlier in this report much of the policy landscape is subject to change. Officers consider that the best way to manage these priorities is to progress the housing policies through two separate revisions to the City Plan. The first (as part of a 'main revision' that will see detailed policies on a range of subjects currently in the Unitary Development Plan incorporated in the City Plan) will address housing need, delivery and quality policies (broadly those dealt with in the booklet at Annex 1). This main revision to the City Plan will contain all the 'non-controversial' policies with the hope that this approach will help the Revision to progress through the examination process smoothly.

- 8.5 The affordable housing policies and any future changes to housing numbers are expected to be part of a later revision to Westminster's City Plan, which will be progressed after the main revision is adopted. This will ensure that the main revision to the City Plan is not delayed by waiting for the Housing and Planning Act Regulations to be published.

- 8.6 The housing need, delivery and quality policies will include updates to:
- Strategic Policy S14 Optimising Housing Delivery
  - Strategic Policy S15 Meeting Housing Needs

And new policies:

- CM14.1 Housing Quality
- CM15.1 Housing for Vulnerable People
- CM15.2 Housing for Older People
- CM15.3 Student Accommodation

8.7 The affordable housing revision to the City Plan will: update existing Strategic Policy S16 Affordable Housing; introduce a new method for calculating affordable housing contributions/ payments in lieu, introduce an affordable housing credits system (which will match the adopted mixed use credits system); and set out the proportions of starter homes, social and intermediate housing which are required from developments. The starter homes requirement is likely to come directly from the Housing and Planning Act Regulations – Government has suggested that 20% of new homes will be required as starter homes, but also that exemptions may be able to be applied for in certain areas. This is the detail we await from the Regulations and the reason why these policies cannot be progressed until this is known.

8.6 **Do Members agree with the two-stage approach to the housing policies City Plan revision outlined in this report?**

## 9.0 Financial Implications

9.1 Work on developing the City Plan is met from existing budgets. There are therefore no direct financial implications associated with the consultation.

## 10.0 Legal Implications

10.1 The revisions to the City Plan are part of the plan development process as set out in the Town and Country Planning Act 1990 (as amended), The Planning and Compulsory Purchase Act (2004) and the Town and Country Planning (Local Planning)(England) Regulations 2012.

10.2 The Housing and Planning Act 2016 provisions are not all in force yet including the provisions relating to starter homes.

10.3 The remaining legal implications are implicit within the report.

**If you have any questions about this report, or wish to inspect one of the background papers, please contact:**

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## **Annex 1**

### **Housing Need, Delivery and Quality Development Management Policies consultation booklet**

Available at:

[http://transact.westminster.gov.uk/docstores/publications\\_store/Housing%20Need%20Delivery%20&%20Quality%20\(Jan%202014\)%20FINAL%20VERSION%20SIGNED%20OFF.pdf](http://transact.westminster.gov.uk/docstores/publications_store/Housing%20Need%20Delivery%20&%20Quality%20(Jan%202014)%20FINAL%20VERSION%20SIGNED%20OFF.pdf)

## **Annex 2**

### **Affordable Housing Development Management Policies consultation booklet**

Available at:

[http://transact.westminster.gov.uk/docstores/publications\\_store/Affordable%20Housing%20\(edited%20to%20include%20housing%20market%20assessment%20links%20030215\).pdf](http://transact.westminster.gov.uk/docstores/publications_store/Affordable%20Housing%20(edited%20to%20include%20housing%20market%20assessment%20links%20030215).pdf)