

## Draft London Plan Spatial Development Strategy

### Overall Spatial Development Strategy

#### ***M10. Should the vast majority of London's development needs be met within London?***

##### ***a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development?***

Firstly, there is no guarantee that 66,000 dwellings per annum can be delivered each year until 2041 as the DLP is only able to identify a housing land supply between 2019/20 and 2028/29 (paragraph 4.1.8A). The Mayor is able only to identify land to accommodate 65,000 homes over this period.

Nor is there any guarantee that the 35 constituent local planning authorities in London will be able to deliver housing targets in line with the assessment of capacity in the Mayor's Strategic Housing Land Availability Assessment 2017 (SHLAA 2017) for the next ten years. As the SHLAA 2017 correctly states at paragraph 1.5, the SHLAA 2017 cannot allocate a site. This is a matter for the Local Plan. As the SHLAA 2017 states: "*SHLAAs do not determine whether a particular site should be allocated for development as this is the role of the development plan document.*"

This goes to one of our central concerns about the relationship of the DLP to local plans. The assessment of the housing land supply is worryingly theoretical, yet the theory in the SHLAA (and thus the strategy set by the DLP) is only tested at the local plan level by which point it is too late to reverse the London Plan strategy as this proves to be a flawed one in terms of its land supply assumptions. This is the reason why the London Plan continues to fail. The matter of housing delivery in London is inadequately monitored, and a flawed London Plan strategy will not be addressed for another three or five years.

The past track record of the London LPAs (referred to in my previous statement – M7) to meet and exceed the current London Plan 2016 targets is not encouraging in this respect. So far, only six LPAs have produced local plans that are able to exceed the benchmark targets set out in table 3.1, and this only totals to 1,105 additional homes a year above the minimum number of 42,000 dpa required by the 2016 Plan. Most LPAs who have adopted plans that reflect the London Plan 2016, or who have local plans at examination, are only able to meet the benchmark targets.

While it is possible in theory that London could recycle enough land to accommodate 66,000 homes each year up to 2041, experience and scrutiny of the current record does not support this.

It is also important to bear in mind that the Mayor is accountable for the delivery of one quarter of the country's overall housing requirement (if one use the standard method as the measure of England's need. This generates a need for 266,000 homes per annum for England as a whole. London's OAN of 66,000dpa equates almost precisely one quarter of the national need). The London Plan is too important to get wrong by basing a land supply assessment on

some very notional assumptions. It is unlikely that this would pass scrutiny elsewhere in England.

***b) Alternatively, would accommodating some of London's development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development?***

Working with the authorities of the WSE to develop plans to accommodate London's housing shortfall through a programme of planned dispersal, including the potential for new 'garden communities' would be sensible. However, there is no political support for this now by either the Mayor or the local authorities of the WSE, and nor is there an effective mechanism to deliver this at present. Any new towns or expanded towns that are being planned for in the WSE at the current time are to accommodate the indigenous housing needs of their own projected population growth, albeit this would in most cases include trend migration from London (we write in most cases, because Reigate & Banstead adopted a plan in 2014 that would not accommodate any out-migration from London in order to reduce its overall housing requirement). A framework for cooperation on the planned dispersal of population is not provided for by the DLP, and there is no mechanism in the DLP that would ensure that this could happen over either: a) the next decade; or b) up to 2041.

This is not helped by the Mayor refusing responsibility for the duty to cooperate. Weak though the DTC is as a planning tool, it is stronger than the Mayor's duty to 'inform and consult' as the latter places the Mayor under no obligation to come-up with tangible plans in the WSE that will accommodate an element of the London's housing need such as the 1,000 dpa shortfall (1,065 to be precise) implicit in the DLP, or any undersupply beyond 2028/29 up to 2041. Experience tell us that relying on 'willing partners' (paragraph 2.3.7) is extremely unlikely to yield positive planning outcomes in the form of concrete plans in the WSE that explicitly commit to accommodating a specified number of homes relating to an identified housing shortfall in London.

A more reliable strategy to accommodate London's housing needs would involve a review of London's Green Belt.

***c) If so, is there a realistic prospect that such an approach in London and the wider South East could be delivered in the context of national policy and legislation?***

There is no realistic prospect that the 1,000dpa shortfall implicit in the new DLP, or any shortfall that there might be for the period beyond 2028/29 up to 2041, will be accommodated. Local planning authorities outside in the WSE will not plan for unmet needs unless the Mayor takes responsibility for this and writes to them with a formal request that they consider this as part of their own plan preparation (backed-up by a potential threat that the Mayor could object to a plan if it does not formally make provision for an element of London's unmet housing need). We fear the Mayor will not do this because: a) the Mayor might not accept that he has an unmet housing need, despite this being implicit in the new DLP; and b) because he does not consider this is his duty because, in his eyes, the Duty to Cooperate does not reside with him and the preparation of the London Plan.

At best, the informal consultation arrangements that currently prevail will continue so long as the Mayor and the WSE are able to maintain the illusion that London is accommodating all its housing needs.

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