

East of England LGA Written Response

Respondent no.1384.

Matter 19

Housing Requirement and Supply, Targets, Small Sites and Monitoring

Housing Supply and targets

Written statements in response to M19 may be up to 4,000 words in length.

M19. Are the overall 10 year housing target for London and the target for the individual Boroughs and Corporations set out in Policy H1 A and in Table 4.1 justified and deliverable? In particular:

a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the Strategic Housing and Employment Land Availability Assessment (SHLAA) reasonable and realistic?

b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?

East of England LGA's written statement for M10 does raise issues relating to whether the IIA has adequately recognised and assessed the proposals in the plan to export 1.5% of housing needs to areas beyond London – concluding that it has not.

c) Policy H1 B 2) a)-f) identifies various sources of capacity. Will these be sufficient to meet the ten years targets and what proportion of housing is expected to be delivered by means of the different types? How much is expected to be delivered on existing industrial land in the context of Policies E4-E7?

d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?

e) Is the emphasis on development in outer London consistent with the intention in Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?

f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?

g) What is going to bring about the step change in delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement?

h) Should Table 4.1 include targets for different types and tenures of housing?

i) Should the target be for longer than 10 years given that the plan period runs to 2041?

j) How and where is the shortfall between the identified need of 66,000 additional homes a year and the total annualised average target of 64,935 to be made up? Will LPAs outside London in the wider south east be expected to deal with this on an ad hoc basis and is this realistic?

The draft London Plan was based on London meeting all of its development needs without using Green Belt land or MOL.

'2.3.1 This Plan aims to accommodate all of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces.'

However, paragraph 2.3.4, introduces some uncertainty by referring to **'working with willing partners** beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.' in the context of London's housing needs being 66,000 per annum and capacity being 65,000 dwellings per annum - the intimation being that willing partners beyond London would be sought to deliver the 'missing' 1,000 dwellings per annum. However, no reference is made within the Housing section of the Plan to any of London's housing need being diverted beyond the Capital. Given this uncertainty, In its response to the consultation on the Plan East of England LGA (EELGA) sought clarification on its intentions with regard to the 'missing 1,000'.

The minor changes include the following:

*'2.3.1 This Plan aims to accommodate ~~all~~ **the vast majority of London's growth** within its boundaries without intruding on its Green Belt or other protected open spaces.'* (MSC.2.37)

The GLA has subsequently clarified that the strategy for meeting the 'missing 1k' is indeed to seek willing partners beyond London. Exportation of 1.5% of London's housing needs beyond the Capital is therefore an integral part of the spatial strategy to meeting London's housing needs. This represents some 10,000 dwellings over the first 10 years of the Plan. It is not known whether this was the original intention of the Plan or whether it is a subsequent change associated with the minor changes.

EELGA would expect to see some evidence of the implications of dispersal beyond London, but there does not appear to be any. An obvious place to expect to see some analysis of the advantages and disadvantages of such an approach would be the IIA, but neither the original IIA nor the addendum accompanying the minor changes properly recognise this or provide any meaningful analysis/judgement/conclusions.

Paragraph 2.3.8 of the Plan appears to be the only place providing any guidance on how the willing partner approach is to operate *'.....Where appropriate, the Mayor will **respond to Local Plans outside London and support for example Memoranda of Understanding or other mechanisms to formalise partnership agreements/commitments between relevant authorities. Work with some individual authorities and groups of authorities in the WSE has been initiated and is being pursued further. The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.'***

As far as EELGA is aware there has been no explicit meaningful discussion with local authorities in the East of England in relation to their willingness to accommodate any of the 'missing 1k'. There have been no discussions at the wider south east political steering group on the acceptability of and potential delivery mechanisms for it.

Paragraph 2.3.8 does seem to suggest that the willing partner arrangement is to be ad hoc between individual local authorities and London - it is not proposed to be managed in a strategic sense. It is not possible to say at this stage whether this approach is realistic, but in the short term at least there must be some uncertainty associated with delivery.

EELGA therefore has concerns with this overall approach as set out in the draft London plan. If requested by the inspector, we would suggest the following changes to the supporting text of policy H1:

4.1.1 The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified **need for 66,000 additional homes per year**. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons accommodation within the overall figure. **The new Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.**

4.1.8B There is a 10,650 dwelling shortfall in the ten-year (2019/20- 2028/29) housing targets. and the need for 66,000 additional homes per year identified by the SHMA. Therefore, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate this shortfall (1,065 dwellings per annum in the period 2019/20 - 2028/29.....) in sustainable locations outside the capital

k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?

No comment

l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

No comment
