

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?

In the Newham context, an extensive review of the Borough's deliverable land took place throughout 2016/17, through LBN and GLA joint working on the London 2017 SHLAA (discussed in more detail in M5). This included site analysis informed by local knowledge, which attempted to optimise potential delivery whilst allowing for an evaluation of constraints and consideration of the on-site land use mix (in accordance with the local policy context).

The final large sites housing figure for the London Borough of Newham (LBN) was then agreed, through a careful process of scrutiny between LBN and the GLA, to be reasonable and achievable. Assumptions are therefore a result of bottom-up collaborative process which resulted in a capacity-derived large site target that would be effective in the long term.

Moreover, this method for calculating housing capacity in an area where need will always outstrip supply, has been tested through previous London Plan examinations. Provided that the same process of capacity determination occurred with all 35 London Boroughs/development corporations, it is considered that assumptions and analysis (on large sites) are reasonable and realistic.

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?

In light of LBN's response to M20 in relation to housing targets on small sites, it is not considered that these sources of capacity will be sufficient to meet the ten year targets.

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

Having regard to LBN's response to M20 in relation to housing targets on small sites, it is not considered that the focus on existing built up areas will be sufficient. It is LBN's position (specifically as expressed in response to questions M7 and M20 that given the uncertainty around small sites delivery potential, the GLA has a strategic responsibility to explore green belt and MOL review for any potential opportunities.

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

It would not be reasonable to include targets for types and tenures of housing given considerable variations in need evidenced at Borough level. As such, Local Planning Authorities across London need to be free to meet their housing needs, justified within the context of local evidence base, in a plan-led way and not through a top-down approach.

It is beyond the remit of the London Plan in its strategic role to set such targets. This will be explored further in LBN's response to M28 (to follow).

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

In the first instance please refer to LBN's response to M20 which addresses the flawed methodology behind housing capacity assumptions. As stated, there is no evidence to demonstrate that the approach to the overall housing target, given the small sites component, will be effective or is justified in the short or long term.

In relation to calculation beyond 2028/29, LBN agree (given our response to M19a) that the use of SHLAA identified capacities on large sites is sensible. However, the assertion that a small sites figure should be rolled forward for another 11 years at the same rate is unfounded. The methodology in calculating small sites capacity is arguably flawed and it has not been demonstrated that this level of supply is achievable up to 2029, let alone beyond it.

Even if it could be justified that the 2019-29 target was achievable, small sites identified through H2's locational criteria are a finite resource. As these are already residential in nature, it cannot be assumed that more would continue to come forward in the same way that new large sites become deliverable overtime i.e. through changes in market demand, or strategic review of wider landholdings.

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

Please see the Council's response to M17 in relation to failing the Government's Housing Delivery Test and the knock on affects to the overall regional spatial strategy of the London Plan and Local Plan documents.