

London Plan Written Representation

Ministry of Housing Communities and Local Government (MHCLG)	Reference ID 2631
Matter Title – Housing Supply and Targets	Matter no. 19
<p>Matter Question (s)</p> <p>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:</p> <p>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?</p> <p>b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?</p> <p>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?</p> <p>d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?</p> <p>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?</p> <p>f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?</p> <p>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?</p> <p>h) Should Table 4.1 include targets for different types and tenures of housing?</p> <p>i) Should the target be for longer than 10 years given that the plan period runs to 2041?</p> <p>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?</p> <p>k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?</p> <p>l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?</p>	

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

1. In our response to the draft London Plan consultation, the Government raised a concern that the combination of the draft Plan's policies could place a significant regulatory burden on new development and that this could have the effect of putting pressure on the viability of development, potentially dampening the potential for the needed increase in housing delivery.

2. The Government understands that others, in particular in the development industry, have raised this concern through their responses to the draft London Plan consultation and have cast doubt on the robustness of the GLA's viability assessment. These matters will also be considered later in the Examination under Matters M92-93. We have already seen a significant reduction in housing delivery in the year 2017-18. This may in part be due to some of the policies that are within the draft London Plan effectively being rolled out through the Mayor's approach to planning applications over the past two years.
3. Therefore it will be very useful for the Examination to fully consider the issue of the viability of the Plan and the combined effect of its policies on housing delivery (as well as the impact on the delivery of other forms of development).

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

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

4. The Government is concerned about the ten-year housing requirement for Boroughs and how that will interact with Borough Local Plan preparation.
5. In accordance with the 2018 NPPF (para 67), the Boroughs will need to demonstrate *"Specific, deliverable sites for years one to five of the plan period, (with an appropriate buffer) and specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15 of the plan."*
6. By not setting the requirement over a longer period, such as 15 or 20 years, the London Plan will put Boroughs in a difficult position in their Examinations for the period post-2029. This demonstrates that the setting of the requirement figure across the longer-term period is not tied to the ability to identify deliverable sites in the latter years of the plan (through reference to the 2017 SHLAA). Through this wording it is clear that the GLA need less of a degree of certainty that any identified sites will come forward in the latter years the plan, but that the London Plan should provide more clarity over the level of housing need that should be planned for.
7. Despite the GLA's position outlined in paragraph 1.4.4 of policy GG4 and paragraph 4.1.8A, if Boroughs are to be compliant with the 2018 NPPF they will need to use the standard method for assessing local housing need to determine their housing requirement post 2029, unless exceptional circumstances justify an alternative approach, because there is no specific housing requirement in the London Plan. This adds an unnecessary layer of complexity to their plan making.
8. Further at para 0.0.14 of the draft London Plan (as amended with the Mayor's proposed Minor Modifications), the Mayor states; *"However, some of the more detailed elements of the Plan, such as the annual housing targets are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land*

Availability Assessment (SHLAA), which due to the dynamic nature of London's land market does not attempt to robustly identify capacity beyond 2029."

9. It is clear that for Boroughs to comply with the 2018 NPPF when preparing their Local Plan, this is not the correct basis for establishing a medium to longer term identification of housing need, as explained below.
10. The dynamic nature of London's land market does little to justify an approach that restricts the housing requirement timeframe due to lack of certainty that sites to meet the total requirement can be identified at this point in time. The requirement, as identified through the SHMA, continues to exist as identified and therefore should be included in Borough targets across the plan period if the GLA believes it can be met by Boroughs. The increased certainty needed for sites and broad locations as the plan progresses can then be addressed further through future plan reviews. Therefore we believe the approach set out in 4.1.8A is not justified in line with the 2012 NPPF.
11. We are also concerned that previous London Plans set Borough targets as a minimum, whereas the draft London Plan does not appear to refer to the housing requirements as minimums. We are aware that some authorities may seek to achieve a higher housing target. The London Plan should not act as a brake on such ambitious authorities who believe they can plan for more than their London Plan requirement. This is especially the case where Boroughs make clear reference to meeting their housing need as calculated using the standard method, where this exceeds their London Plan target.

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?

12. In relation to question J, as mentioned in the Government's Written Representation on Matter M16 (Wider South East), it is not clear whether the shortfall in sites to meet the Mayor's Housing Need figures has been discussed with authorities in the wider south east, or within London. There does not appear to be any formal agreement for providing capacity to meet this gap.

Resolving the Government's concern

13. The London Plan could address the Government's concerns by setting a housing requirement for Boroughs that is appropriate to cover their plan periods beyond 2029 and ensuring the housing requirement expressly refers to Borough targets as a minimum.

Word Count (excluding Question and title/references) = 1017 words