



**South East Strategic Leaders and South East England Councils
(Examination in Public IDs 2448 and 3133)
London Plan: Examination in Public – Matter M19
Housing supply and targets**

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?
- 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?
- k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?
- l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

SEEC/SESL comments

1. SEEC and SESL welcome the Mayor's ambition in the consultation London Plan to achieve a sustainable step-change in growth, to deliver the majority

of London's housing and other growth needs within its own boundaries. However, we ask for the Inspectors' support in addressing aspects of the Plan where further clarification is needed about how the Mayor will deliver his aims. If not addressed these will create uncertainty which could not only hinder delivery of the Plan, but also impact negatively upon the wider South East's local growth plans. We focus this submission on EiP Matter 19 parts (i) and (j), as these have the most significant implications for councils in the wider South East.

SESL/SEEC comments on part (i)

2. The Plan includes London borough housing targets for only the first 10 years (to 2029) of the 22 year plan, overall aiming to approximately double the current rate of homebuilding. We would welcome the Inspectors' support in pressing the Mayor for clarity in the final Plan about what happens after the first 10 years. Local plans in the wider South East are expected to take account of longer term requirements, preferably looking at a 15 year period. The Mayor's short time-horizon leaves uncertainty for all partners delivering/developing plans. It is also likely to make it difficult to reach agreements with any potential 'willing partner' councils in the wider South East (see also M19(j), and M6, M10 and M16) who already produce detailed plans required to cover longer timescales.
3. The Plan should, at the very least, set out evidence-based thinking about provision in London post-2029, including scenarios re possible housing need and strategic options to 2041. This includes publishing the details of any work done to establish whether London can accommodate all or some of its housing needs post-2029. In addition, although the Mayor's plan, monitor and manage approach for the Plan is understood, it will require a robust monitoring framework so progress can be demonstrated.

SESL/SEEC comments on part (j)

4. SEEC and SESL welcome the Mayor's ambition to accommodate the vast majority of London's housing growth within its boundaries. However, we ask for the Inspectors' support to secure further clarification on three key aspects – set out below – about how the Mayor will deliver his aim and address the identified shortfall between London's housing need and capacity. If not tackled, these will create uncertainty which could negatively affect not only the delivery of the Plan, but also the wider South East's own local growth plans. Given that the wider South East has its own significant pressures on housing, protected land, transport and wider infrastructure, it would be wrong to assume there is capacity for the wider South East to accommodate any London overspill. It would not be realistic or viable for councils in the wider South East to deal with London's shortfall, particularly on an ad hoc basis.

Shortfall

5. GLA's SHMA shows that London needs 66,000 homes a year and its SHLAA identifies capacity for 64,935 – leaving a gap of 1,065 homes a year for at least 10 years. The Mayor should clarify how he will address the gap of

1,065 homes a year. The Plan should also make it clear that responsibility remains with the Mayor/London to resolve any remaining unmet housing need from the SHMA. This is important to avoid speculative developers arguing that local plans in the wider South East should pick up London's overspill in an ad hoc way, undermining growth strategies of councils in the wider South East.

6. In consultation with partners including the Wider South East Political Steering Group (WSE PSG - see our submissions on M5 and M6 for further background), the Mayor should develop a clear and transparent delivery and risk monitoring framework for London Plan policy delivery and implementation. This should form the basis of regular reporting and dialogue, to help the GLA consider the actions required to help address any Plan delivery issues. Clarity is also needed in the Plan about how the Mayor will ensure London boroughs meet their share of the Plan's overall target. As a contingency, the Plan should also address how the Mayor will ensure London's needs are met in its boundaries if the boroughs do not meet their targets.

Green Belt

7. The draft Plan reiterates the Mayor's protection of London's Green Belt, which does not reflect NPPF guidance for all councils about how/when to consider its review. Given councils outside London already have to consider Green Belt review to accommodate their own assessed housing need, we ask the Inspectors to examine whether the Mayor should show leadership and encourage review at London-wide level – or explain his justification for not doing so. This is particularly relevant given the Plan's gap of 1,065 homes per year between need and supply. The significance of paragraph 84 of the NPPF, and in particular the need to "promote sustainable patterns of development" when reviewing Green Belt boundaries, should not be under-estimated; it has been a key issue in a number of local plan examinations. It would be helpful if the Inspectors could clarify whether the draft Plan accords with the NPPF on Green Belt.

Wider South East

8. As SEEC and SESL have previously explained, whilst local circumstances vary, it cannot be assumed that wider South East authorities would be able to accommodate additional unmet housing needs from London. It is certainly not realistic for councils to deal with this on an ad-hoc basis. Many of our member authorities already have their own challenging growth pressures and constraints, as well as facing similar challenges as London in ensuring delivery of housing and securing infrastructure funding. In part, the strong interdependencies between the wider South East and London make them both successful. It is also important to recognise that the wider South East is more than a commuter economy and has strong economies in its own right, which need investment to sustain and grow, supporting local growth plans – and continuing to make a vital net contribution to UK-wide public finances.

9. Despite the Mayor's welcome aim to accommodate the vast majority of London's growth in its own boundaries, the Plan explains he is interested in working with 'willing partners' for growth beyond London. The Mayor sees exploring options to accommodate housing growth outside London as a 'prudent long-term contingency'. He is also looking at the scope for substituting some industrial capacity, moving jobs outside London where there are mutual benefits for areas that choose to cooperate on providing sites for homes and/or jobs (Policy E7.F).
10. Councils across the wider South East are already planning and delivering high housing growth. This is designed to meet local demands but also reflects, where appropriate, an allowance for migration from London. This is because migration patterns relating to London are incorporated in the official population data that underpins objectively assessed housing need for relevant areas in the wider South East. However, many face significant constraints (including Green Belt, AONB, National Parks, SSSIs and SPAs) and overstretched infrastructure that prevent them offering to accommodate further London growth. The South East has an estimated £15.4bn infrastructure funding gap to 2030. The wider South East has delivered some of the highest housing completion rates in the country. However, this growth has far outpaced the delivery of the infrastructure that is needed to sustain it. Parts of the wider South East are at breaking point with, for example, severe congestion on the roads, overcrowded trains and lengthening waiting times for health facilities, all of which are ever increasing challenges to businesses and quality of life.
11. SEEC and SESL, therefore, welcome the Plan's focus on only willing partner councils – rather than all areas outside London – who might choose to come forward if they think they may be able to help accommodate any jobs or unmet London housing needs in return for mutual benefits. This is more appropriate than an unmanaged ad hoc approach. However, the Mayor's processes for this engagement, or the benefits for outside London, are not clear at present. There has been little sustained or structured attempt by the GLA to identify, establish or develop working relationships with authorities who could be potential willing partners for growth. We would welcome the Inspectors' support for actions that would help address this in the Plan (also addressed in our submission re Matters M10 and M16):
 - i) To help councils outside London consider whether they may be in a position to discuss being a 'willing partner' for growth with the Mayor, clarification is needed in the Plan on the benefits to councils and what the Mayor is asking for. As explained in our submissions on Matters M5/M6 and M10, councillors in the wider South East have suggested that a framework or list of options would help local authorities outside London understand what benefits could be on offer. In this way, potential partners can see if there could be mutually beneficial outcomes, supporting local economic and other growth ambitions. These could, for example, include:
 - If taking extra housing growth from London is to support local social/economic ambitions, what infrastructure investment would come with it (for example, for transport or affordable housing)?

- If relocated jobs are to support local economic growth, what type of jobs would be covered, what type of sites would be required and how would businesses be persuaded to move?
- What is the timescale of the Mayor's 'long-term contingency'? How does this fit with local plan preparation in the wider South East, which are already looking at least 15 years ahead?

ii) We also ask the Inspectors to consider our previous suggestion for the Mayor to undertake a formal call for interested councils outside London to come forward who want to discuss being a 'willing growth partner'. This would provide a more transparent and certain approach than GLA's current informal discussions.