

## **NON- PARTICIPANT STATEMENT**

### **RESPONDENT 3237**

#### **HIGHBURY GROUP ON HOUSING DELIVERY**

##### **M22 MONITORING HOUSING TARGETS**

**Does Policy H3 provide an adequate basis for the monitoring of housing targets? In particular: a) Does Policy H3 BA provide an adequate basis for differentiating between the small sites target as a component of the overall housing target? b) Are the provisions in Policy H3 C and D regarding how net non-self- contained accommodation should be counted justified? c) What measures should be taken if relevant targets in the London Plan are not met?**

Effective monitoring and housing and planning policy making require a step change in the availability of data covering, at Borough level, losses of housing units from each tenure and rental band as well as new production. This is essential to give an adequate view of how the stock is changing through the sale of council housing under Right to Buy, redevelopment, conversion between rental bands and otherwise. All data on sub-market rented housing needs to include data on rent levels and security of tenure. This means that changes of tenure from low cost rent to 'affordable' rent or other forms of intermediate / sub-market rent should be monitored.

In relation to H3BA, we do not consider it to be necessary to have separate targets for small sites as set out in Table 4.2. While it is useful to monitor housing output in relation to capacity estimates in the SHLAA, this is not a strategic policy matter. We therefore welcome the clarification in H3BA.

In relation to H3C, we consider that provision of non- self-contained accommodation for students should be monitored separately and not counted as contributing to overall housing targets. This is consistent with the monitoring basis established by the 2004 London Plan.