

DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

Statement on Matter M22

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Monitoring housing targets

M22. 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?

The four main types of housing supply provide a good basis for monitoring the net additional output of housing units.

The definition of “net additional” is important – London Forum **welcomes** the addition amalgamations, but it should cover more than “amalgamating flats into larger homes” (see footnote 41A).

It needs to cover:

- the deconversion of buildings originally converted into flats, but then deconverted into larger flats or a single house;
- the amalgamation of purpose-built flats into larger flats; and
- the amalgamation of houses.

In Central London boroughs, the number of units being lost are increasingly the subject of policies to limit these trends.

Since the purpose of monitoring is to establish whether the newly-completed stock is meeting the housing needs of Londoners, it is questionable whether investment property that is “buy-to-leave” or second homes should be regarded as additional.

M22 a) - Policy H3 BA clarifies that the small sites targets are a component of the total and that it is likely to vary in size from year to year. It is essential to monitor the performance of the small sites policy separately, even though it will be a component of the overall figure in H3 A.

Policy H3 provides clarity on what should be monitored but it does not require boroughs to produce Annual Monitoring Reports on net housing delivery in a consistent manner at specific timescales. Policy H5 has that requirement in its supporting paragraph 4.5.10.

PROPOSAL: Policy H3 should have an additional section, as follows.

“Boroughs should monitor and include in their Annual Reports the percentage of new homes delivered that are affordable within the types detailed in the Mayor's Affordable Housing and Viability SPG and Policy H5. They should monitor and report on new-build housing which does not meet objectively-assessed need, such as second homes, investment property and “buy-to-leave” properties, which reduce the amount of completions that meet the objectively-assessed need for homes for Londoners.”

M22 b) – Yes

M22 c) - Local authorities grant consents but do not build housing, so their ability to influence completions is limited. The Letwin suggests issues for which measures could be taken and the NLP should have policies for his recommendations.

If housing targets in the London Plan are not met, the Mayor should analyse the causes, agree with the boroughs what could be done and seek Government action or funding to restore the required trend lines for new homes of the required types. Supplementary Planning Guidance may be required. There are measures described in the London Housing Strategy and they may need updating to strengthen the methods summarised in NLP paragraph 4.1.4. The Mayor may need to provide resources and support to a borough to help it to achieve the full potential of its developable sites.

PROPOSAL: The Key Performance Indicator for affordable homes in NLP Chapter 12 should monitor delivery of each type of affordable home against the targets and against the need expressed in the 2017 SHMA which should be updated every three years.