

## **East of England LGA Written Statement**

**Respondent no.1384.**

**Matter 94**

Viability, Delivering the Plan and Monitoring

*Monitoring*

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**M.94. (a) Would the key performance indicators and measures set out in Table 12.1 ensure that the Plan can be effectively monitored such that the Mayor and others can respond effectively if policies are not delivering the expected outcomes, including those set out in Good Growth policies GG1 to GG6? (b) Should the Plan set out measures that would be taken in the event that monitoring demonstrates that the expected outcomes are not being delivered?**

There is a relationship between monitoring and the need for a review of the London Plan. If the Panel reach the conclusion that an immediate review is required, the need for the plan to identify review triggers would not be relevant.

### **Housing**

The local authorities in the East of England responded to Matter 22 regarding monitoring of housing targets and sought amendments to the supporting text and policies to reflect that under delivery of housing would result in a review of the London Plan. The Mayor, through officers of the Greater London Authority, has offered text committing to a review of the London Plan if housing delivery falls below a certain threshold over time.

The plan cannot be effectively monitored as the Key Performance Indicators (KPI) and Measures in table 12.1 do not include monitoring the delivery of growth outside of London through the willing partners approach (SD3), particularly whether the missing 1,000 homes per annum (1kpa) is being met outside London, or the assumptions that have informed the creation and assessment of the policy.

Of the Key Performance Indicators and Measures in table 12.1, the delivery of additional homes is only being monitored by the 66,000 net additional homes to March 2029. The 2029 date appears to have been selected as this relates to the 2017 Strategic Housing Land Availability Assessment (SHLAA), which does not identify capacity beyond 2029 (London Plan, para. 0.0.14). However, the monitoring target is the 66,000 net additional homes per year needed, rather than the 65,000 that can be supplied. This would allow the London Plan to accommodate the 1kpa through, as has been suggested, greater levels of intensification particularly within the opportunity areas. If this is the case and the targets achieved, this KPI would appear to be a suitable.

The current London Plan seeks to encourage London Boroughs to exceed their specific housing targets to address the current (7,000) annual shortfall. The monitoring framework in the Annual Monitoring Report should be able to capture delivery above which the plan had been based.

If the willing partners approach is followed, actions under SD3 to provide for the missing 1kpa would be incorporated but, as this is a separate policy and mechanism (through agreement rather than general conformity to the London Plan), this needs to be monitored separately but there is not yet a net pipeline of approved homes that could be assigned.

The housing KPI will need to be monitored over at most 5-year trajectories by:

- completions and commitments, assigned against;
  - cumulative surplus/shortfall against the 66,000 per annum supply within London (with a separate review trigger), and
  - cumulative surplus/shortfall against the supply through willing partners outside London.

**b)**

If the expected rate of delivery against a 5-year trajectory is not being met, there is a clear case for a review of the London Plan to reconsider the spatial options within London and how the capital relates to the Wider South East. There should not be an automatic assumption that under-delivery within London should be met by authorities in the Wider South East.

**Interaction with the Wider South East**

Monitoring of the assumptions used in the formation of the London Plan are absent from the Key Performance Indicators and Measures. The London Plan is based on a range of evidence, such as the SHMA and an Integrated Impact Assessment, which justify the policy decisions made including the maintenance of the Green Belt within the boundaries of Greater London.

Total population growth is projected to fall from 105,000 in the year to mid-2017 to 58,000 for the year to mid-2041. Over this period, the contribution of natural change is steady at approximately 80,000 a year. The slowing of the growth rate is therefore due to the changing contribution of migration. Overall, net outward migration from London increases over the projection period increasing from a net inflow of 25,000 a year in 2016 to a net outflow of 18,100 in 2041 (SHMA, para. 3.60, para. 3.61, Fig 29).

The London School of Economic's review of migration trends in the Wider South East (**NLP/AD/59**) demonstrated the complex interaction between demographic changes and between areas and the supply of new homes. This review highlighted the significance of a deconcentration to London's net migration balance and that driver of this current is been demand for additional living space, which then has wider impacts over the Wider South East as existing residents in an area tend to move outward. Clearly, a monitoring framework could not replicate the complexity of these interactions but the relationship between London and the Wider South East cannot be ignored either.

Housing delivery failure against London Plan targets is a consistent and ongoing theme. There would clearly be a range of potential serious consequences, particularly for younger people and people on low incomes, if housing delivery within London continues to fail – both within and beyond the capital (exacerbating the tendency to migrate, increasing commuting, increasing migration assumptions within official population projections that then inform the new Standard Method, etc). However, the LSE report highlighted that under delivery of housing forecasts has been a frequent feature which has been offset by people living at higher densities. There are, of course, consequences for meeting the needs of different households and addressing overcrowding.

Whilst housing delivery is rightly a Key Performance Indicator and overall forecast of population change might be met within London, the interaction with the Wider South East also needs to be monitored against the assumptions in the SHMA.

**(b)**

The Integrated Impact Assessment (and addendum report) assessed the spatial options, including selective green belt release, against the objective on housing supply. It is therefore reasonable that if the London Plan is not delivering on this objective, the chosen spatial option must be reconsidered, and a review commenced.

Whilst under delivery of homes would warrant a review of the London Plan, demographic change might change as forecast without increasing outward net-flows to the Wider South East. Given that the draft

London Plan “is seeking to accommodate the vast majority of London’s future growth within its boundary” (para. 2.3.4), the effectiveness of this approach should be monitored on the outward national migration assumptions used in the plan such as, by 2029, net national migration out of London of around 85,000 per annum.

However, authorities outside London would be using the new standard method, which is based on different trends from ONS. Therefore, monitoring of outward migration to the WSE needs to be considered against the trends that inform the Standard Methodology, which this ONS’s 2014 based population projections. These indicate that, in 2029, a net flow of 77,500 people will be leaving London.

## **Waste**

The current London Plan includes the monitoring of recycling and composting Local Authority Collected Waste as a Key Performance Indicator (KPI). The Annual Monitoring Report (AMR) reports on the process toward the achievement of the policy. Table 12.1 of the draft plan does not include any monitoring of waste as a KPI even though self-sufficiency and transitioning to a circular economy is a significant and ambitious part of the London Plan (e.g. Policy GG6 and S18) and waste reduction, reuse and recycling is an objective identified by the IIA. Paragraph 12.1.13 does acknowledge that “a comprehensive set of complementary and more detailed data and performance measures sit alongside the KPIs in the AMR” but does not include any reference to the management of waste.

The East of England has submitted representations to Matters 68 and 69, which highlight that the ambition in the London Plan for the management of waste will require specific monitoring of the following:

- Recycling and Composting rates of Municipal Solid Waste within London;
- Excavation waste to be reused, recycled and landfilled excavation waste and topsoil, and
- Net management waste (by stream) for self-sufficiency

KPIs to be monitored should include:

- Arisings by waste stream (Household, Commercial and Industrial; Construction, Demolition and Excavation, Hazardous etc)
- Achievements of targets
- Operational capacity by waste stream
- Imports/exports from London

If not separate KPIs, the monitoring of these elements could usefully be part of an updated AMR but a KPI related to waste should be set out in the London Plan. The overall self-sufficiency by 2026 as set out in policy S18A(1) would appear to be the principal focus on which to base a KPI. This does, however, exclude excavation waste, which will need to be monitored by a separate KPI.

## **b)**

If London is unable to achieve self-sufficiency there would need to be reconsideration of what waste management infrastructure would be required and, given the interaction of different land uses, this could only be achieved through a review of the plan.

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