

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?

19.1 For the purpose of planning, London is treated as a single housing market area. The Strategic Housing Land Availability Assessment (SHLAA) 2017 has identified sufficient housing capacity to meet identified housing need within London (with the exception of 10,000 homes, or 1.5 per cent of the need over ten years).

In particular:

a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Strategic Housing and Employment Land Availability Assessment reasonable and realistic?

19.2 Yes. The 2012 NPPF suggests that assessments of housing and employment should be integrated and that SHLAAs should be undertaken at the same time as, or combined with, a review of the land available for economic development.¹ The 2017 London SHLAA has been undertaken in conjunction with GLA studies on the supply of and demand for industrial land² and the findings of these studies have been considered as the SHLAA has been undertaken, with revisions made to some site assessments to account for this. This is explained in detail in Chapters 2, 3 and 5 of the SHLAA report. The SHLAA was informed by evidence collected for the Town Centre Health Check and the SHLAA findings fed into that study's classifications for residential growth potential in town centres as high, medium and incremental.³

19.3 The capacity identified in the SHLAA includes a combination of potential⁴, allocated⁵ and permitted large sites⁶, and a modelled capacity for small sites. The SHLAA provides a comprehensive and robust assessment showing potential residential development capacity of 11,600 large sites across London, undertaken in partnership with boroughs. The SHLAA also provides a comprehensive and robust modelled approach to identify small site capacity, which was undertaken by the GLA. The SHLAA follows a consistent pan-London methodology, which is specifically tailored to reflect London's dynamic land market and reliance on recycled brownfield land.

19.4 Delivery rates for large sites with planning permission are site-specific, with phased build-out rates assigned in discussion with boroughs, having regard to individual site circumstances. This approach is consistent with the PPG.⁷ The density assumptions on allocated and potential large sites are robust, with initial defaults established based on character setting and Public Transport Access level (PTAL), with estimates generally based on the Sustainable Residential Quality (SQR) residential density matrix (the Matrix) of the London Plan 2016. The densities have been amended to reflect trends in planning approvals within opportunity areas and town centres, and with scope for site-specific densities to be adjusted by boroughs in discussion with the Mayor,

¹ NLP/GD/03: DCLG, NPPF, March 2012, Paragraph 161

² NLP/EC/006: AECOM, London Industrial Land Supply and Economy Study, March 2016; and NLP/EC/003: CAG consultants *et al*, London Industrial Demand Study, October 2017

³ NLP/EC/013: GLA, Town Centre Health Check, January 2017

⁴ Potential development sites do not benefit from an active planning permission

⁵ Allocated development sites do not benefit from an active planning permission but they are allocated in a Local Plan.

⁶ 'Large site' is defined as having a site area over 0.25 ha

⁷ DCLG, Planning Practice Guidance (PPG), 6 March 2014, Paragraph 019 Reference ID: 3-019-20140306

considering local circumstances. The approach to density is consistent with national guidance.⁸

- 19.5 The London-wide residential capacity in the SHLAA is considered realistic and reasonable as it is a probability-based assessment that takes account of the reality that not all sites will be delivered over the Plan period. Sites are assigned a 'notional capacity', based on the net residential site area multiplied by the density estimate (following any percentage reduction for other land uses assumed on site⁹). A probability assumption for the site coming forward for development is then assigned based on the planning policy, environmental and delivery constraints affecting it, ensuring that the potential to resolve or mitigate these constraints is fully considered, in accordance with national guidance.¹⁰ These constraints are set out in Table 2.3 of the SHLAA.
- 19.6 Following the borough-level site assessment process, the Mayor undertook a thorough review of the overall quantum of industrial land assumed to be released for housing by boroughs, considering GLA evidence on the demand for industrial uses.¹¹ Following this review, housing capacity assumptions for 111 designated SIL and LSIS sites were edited by GLA officers, resulting in capacity for 9,000 homes being removed from phase 2 and 3 of the SHLAA (the phases which inform the 10-year target)¹². This approach accords with national guidance¹³ and ensures the eventual targets are deliverable in the context of Policies E4 to E7 of the draft London Plan.
- 19.7 National policy¹⁴ and guidance¹⁵ provide for 'windfall' assumptions for the projected rate of housing delivery on unidentified sites to be included in assessments of potential housing supply, providing there is 'compelling evidence' that such sites have consistently become available and will continue to provide a reliable source of provision. Any allowance should be realistic and have regard to both historic windfall delivery rates and expected future trends.
- 19.8 The Mayor is confident the capacity assumptions on small sites¹⁶, informed by modelling undertaken by the GLA, provide a realistic and reasonable estimate of the London-wide small site capacity. This modelling is explained in more detail in chapter 6 of the SHLAA and addressed in the Mayor's statement in response to M20. Recent evidence indicates that small site development is generally viable across London¹⁷ and therefore the change in policy environment should enable future delivery that exceeds recent trends.

b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?

⁸ DCLG, PPG, 6 March 2014, Paragraph: 018 Reference ID: 3-018-20140306

⁹ NLP/GD/03: DCLG, NPPF, March 2012, Paragraph 120

¹⁰ DCLG, PPG, 6 March 2014, Paragraph: 023 Reference ID: 3-023-20140306

¹¹ NLP/EC/006: AECOM, London Industrial Land Supply and Economy Study, March 2016; and NLP/EC/003: CAG consultants *et al*, London Industrial Demand Study, October 2017

¹² NLP/HOU/002: GLA, Strategic Housing Land Availability Assessment, November 2017, Paragraphs 5.50-5.52 & Table 5.14

¹³ DCLG, PPG, 6 March 2014, Paragraph: 001 Reference ID: 3-001-20140306

¹⁴ NLP/GD/03: MHCLG, NPPF, March 2012, Paragraph 48

¹⁵ DCLG, PPG, 6 March 2014, Paragraph: 24 Reference ID: 3-24-20140306

¹⁶ Sites below 0.25 ha

¹⁷ NLP/VI/004: GLA, London Plan Viability Study Addendum Report, November 2018

- 19.9 Yes. Section 9.3.1 (H1 Increasing housing supply) of the Integrated Impact Assessment (IIA) of the draft London Plan¹⁸ and addendum report¹⁹ provides a thorough assessment of the environmental and social implications of the proposed increase in affordable housing targets. The IIA was drafted as an iterative process alongside the draft Plan, and policies were developed in response to the findings of the IIA. The Mayor considers the assessment procedure to be robust and that the conclusions support the policy approach.
- 19.10 The large sites assessment considered the full range of environmental constraints as set out in the SHLAA report: flood risk, aircraft noise, pylons, and health and safety consultation zones, together with open space designations (Green Belt, Metropolitan Open Land, and other types of protected open space). The approach to identifying housing capacity responds to the environmental sustainability of locations with different characteristics.
- 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?**
- 19.11 The potential sources of housing supply identified in Policy H1 B2a-f are designed to guide the planning process and are not an exhaustive list of London’s capacity. The identified sources of supply are considered by the Mayor to be particularly suitable for residential development and the policy provides principled support to optimise housing delivery on these sources of supply. It is not possible to attribute a proportion of housing supply to each of the sources of supply because these categories overlap and are not an exhaustive list of sources. For example, a site may fall into category a) and b). Some potential development sites may not fall into any of these categories. Below is a brief explanation for why these sources of housing supply are specifically identified as potentially rich sources of housing potential.
- 19.12 a) sites with PTAL 3-6 or within 800m of station or town centre boundary: These are sustainable locations for intensification where site capacity may provide a significant amount of new homes.
- 19.13 b) car parks, supermarket, low density retail: The ‘call for sites’²⁰ submissions demonstrated considerable appetite from major supermarkets to develop homes through mixed-use redevelopment of London sites. Several large supermarkets have been redeveloped in London over the past decade to bring forward significant numbers of new homes with re-provided supermarket uses. The London Plan Viability Study Addendum (2018) tested two supermarket redevelopment scenarios in recognition that this form of development may significantly contribute towards meeting London’s housing need.
- 19.14 c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses: Many low density commercial sites can be successfully and viably redeveloped to provide new homes alongside any replacement commercial space.

¹⁸ NLP/CD/02: GLA, Integrated Impact Assessment Scoping Report, February 2017

¹⁹ NLP/CD/05: ARUP for GLA, London Plan IIA Addendum Report, July 2018

²⁰ The GLA undertook a ‘call for sites’ prior to undertaking the 2017 SHLAA in which stakeholders were invited to identify potential development sites for consideration in the SHLAA assessment.

- 19.15 d) the redevelopment of surplus utilities and public sector owned sites: Several public-sector landowners and utilities providers identified sites in the 'call for sites', in particular: TfL, Network Rail, National Grid, NHS property, MoJ, MoD.
- 19.16 e) small housing sites: There is significant capacity on small sites across London. Policy H2 is specifically designed to realise this capacity.
- 19.17 f) industrial land: This is addressed below.

How much is expected to be delivered on existing industrial land in the context of Policies E4-E7?

- 19.18 Table 5.24 of the SHLAA shows the housing capacity assumed in the SHLAA on designated and non-designated industrial sites in phases two and three (2019-2028).
- 19.19 Apart from permitted schemes and allocated sites, the SHLAA followed a cautious but flexible approach to industrial land through the large site assessment. This reflects the draft Plan policy, which rigorously manages industrial land release through a plan-led approach to ensure sufficient stock is maintained to meet demand and that, in overall terms, across London there is no net loss of industrial capacity within designated SIL and LSIS, in terms of floorspace and operational yard space. A detailed explanation of the modelling approach is provided in Chapter 2 of the SHLAA.

d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?

- 19.20 A range of housing tenures and types can be delivered on the sources of capacity and locations encouraged in the Plan as suitable for increased housing provision. The draft Plan increases housing targets in outer London where housing is, relative to inner London, more affordable. Increased housing supply in outer London will also deliver a wider range of housing types, including medium and lower density forms of housing, such as family homes with gardens. This contrasts with many parts of inner London where opportunities to deliver family homes with gardens are more limited.
- 19.21 The focus on small sites aims to ensure housing is brought forward across London by a wider range of developers and to create more opportunities for small and medium developers, custom house builders, self-builders and accelerated models of housing delivery. This will help to provide a range of house types.
- 19.22 The use of protected open spaces for urban extensions would fail to meet the 2012 NPPF requirement for sustainable development due to its harmful environmental impacts, including the loss of green cover and biodiversity and the loss of open spaces for recreational uses by the existing population. It would also be inconsistent with multiple policies within the draft London Plan, including the objectives for Good Growth. Focusing on existing brownfield land is not only more sustainable, it also enables delivery of wider regeneration objectives.
- 19.23 Although it may appear that the release of GB/MOL would provide large sites suitable for volume housebuilders, as Sir Oliver Letwin's report recently demonstrated, these would in reality probably deliver at a gradual rate to respond to market absorption

constraints.²¹ Even in the event these sites were developed, many are unsuitable for intensification due to relatively poor transport connectivity, which limits capacity. In addition, such development would increase car dependency leading to increased pollution levels and road congestion, as well as isolating residents who do not have access to a private vehicle. For these reasons the use of protected open spaces for housing when there are good alternatives available would not be effective or justified.

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?

19.24 The draft Plan does not emphasise development in outer London. The annualised 10-year housing delivery target of 65,000 homes includes 35 per cent in inner London and 65 per cent in outer London.²² However, outer London covers 3.9 times the area of inner London (or 2.8 times the area when protected open spaces are removed from both).²³ Therefore, intensification is very much focussed on inner London in terms of the scale of development that needs to be accommodated per hectare over the Plan period, as it has been so for many years and through previous iterations of the Plan. Figure 19.1 shows the growth rate, in terms of number of existing homes to the number of required homes, in inner and outer London to be almost identical.

Figure 19.1: Housing growth rate in inner and outer London

Administrative class	Total 10-year housing target	Housing stock in 2016	Growth rate
Inner London	270,880	1,476,470	18.3%
Outer London	375,720	2,008,400	18.7%

19.25 Inner London and outer London are administrative classes that are not suitable proxies for 'urban' and 'suburban' or 'well-connected' and 'less-well-connected'. The housing targets follow a consistent methodology across London and reflect identified capacity for each area and there is no methodological bias towards outer London.

19.26 The approach to intensification is governed by proximity to public transport and town centres of a scale that provide a range of goods and services. Historically, the focus for intensification and growth has been concentrated in inner London due to the relative abundance of large development sites. Consequently, the capacity of parts of outer London have been overlooked. The draft Plan policies are designed to realise some of the latent capacity for intensification of more suburban locations. Moreover, to meet London's housing needs and address affordability issues in London, a much greater level of housing supply is required in outer London boroughs to broaden the range of sites coming forward and improve the affordability of new-build supply.²⁴

²¹ MHCLG & HM Treasury, Independent review of build out: final report, October 2018 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Le_twin_review_web_version.pdf

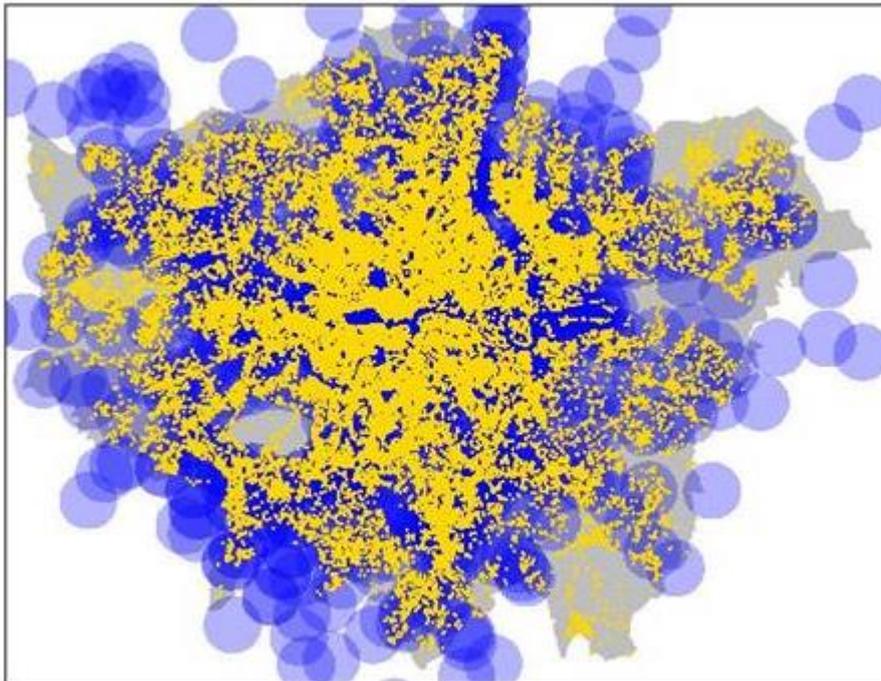
²² The inner London target is 22,953 homes per year and the outer London target is 41,983 homes per year

²³ Outer London area = 126,683ha (75,735ha excluding designated open space). Inner London area = 32,786ha (26,959ha excluding designated open space)

²⁴ NLP/HOU/005: OLC, Removing the Barriers to Housing Delivery, March 2016; and NLP/HOU/017: GLA, London Housing Strategy, May 2018

- 19.27 Most of outer London is better connected by public transport than almost anywhere else in the UK. However, the PTAL model reflects relative connectivity within London and parts of London assigned a low PTAL score have sometimes been wrongly characterised as poorly connected on their own terms. The approach to intensification focusses growth in accessible locations and the scale and capacity of development should be proportionate to a site's accessibility.
- 19.28 GLA analysis of residential permissions in London found that 99 per cent of homes permitted in London were less than 2km from a train station²⁵ (see Figure 19.2). In contrast, RTPI analysis found that just 49 per cent of new homes permitted in 12 UK cities (excluding London) were less than 2km from a train station.²⁶

Figure 19.2: Permitted housing development (yellow) and 2km catchment areas from a station (blue) in London



- 19.29 The approach of the draft London Plan is to make the best use of land and focus housing development in locations which are, or can be made, sustainable, in line with the 2012 NPPF. Policies H1 and H2 encourage housing delivery on appropriate large and small sites within PTAL 3-6 and within 800m of a station or town centre boundary. Development should make the best use of existing transport infrastructure and proximity to town centre facilities and services, thereby reducing the need to travel by car and promoting more sustainable modes of travel, such as public transport, walking and cycling.
- 19.30 Residential densities in many suburban parts of London are lower than that which would currently be considered optimal. In this context, Policy H2 aims to provide the necessary planning certainty to ensure that available small sites in sustainable locations are developed to meet London's housing need. It also seeks to encourage

²⁵ London Development Database, April 2006 to March 2017.

²⁶ RTPI, Only half of housing built within 2km of train stations, RTPI study finds, 2018, <https://www.rtpi.org.uk/briefing-room/news-releases/2018/may/only-half-of-housing-built-within-2km-of-train-stations,-rtpi-study-finds/>

the incremental intensification of existing residential areas within sustainable locations through a range of potential forms of small-scale development, as set out in Policy H2.

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

19.31 The Mayor has tested the cumulative impact of planning policy requirements on the viability of bringing forward development that will deliver the Plan's housing objectives.²⁷ This is covered in detail in the Mayor's statement in response to M92. The study has shown that, in most scenarios, the policy requirements of the Plan do not undermine the viability of development and therefore do not have an adverse impact upon deliverability.

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?

19.32 The AMR 2017 shows net housing completions across London during 2016/17 totalled 45,500, exceeding the target in the current London Plan. This is a healthy direction of travel and shows that, where strategic policies move towards an increase in targets, local plans and delivery rates respond. The focus on unlocking the potential of small sites represents a fundamental shift in approach from the current London Plan. The draft London Plan sets out a clear expectation that development of small sites should be supported, providing greater certainty for those involved in planning and development. The Mayor is currently preparing detailed design guidance to help assist boroughs to optimise development capacity in a range of contexts across London, as well as funding boroughs to prepare Housing Design Codes. These two measures will significantly enhance certainty regarding acceptable forms of small housing developments. This approach will also support a diversification of the housing market by enabling more small and medium sized developers to bring schemes forward.

19.33 The draft London Plan increases housing targets in outer London to diversify the range of housing tenures, types and delivery models coming forward across London. This notwithstanding, development of large sites by volume housebuilders will continue to deliver a significant proportion of new housing supply.

19.34 The step-change in housing delivery will also, in part, result from a diversification of housing products, as supported through the draft Plan. Build to Rent (BtR) homes can accelerate housing delivery because BtR operates as a parallel market to conventional Built for Sale (BfS) homes. This means BtR is not directly competing with the BfS market and it is not subject to the same market absorption constraints as the BfS market typically is. The role of BtR in accelerating housing delivery is discussed in more detail in the Mayor's response to M27.

19.35 A further source of additional housing supply is the relatively high proportion and number of new affordable homes that will be delivered, when compared to the current London Plan. The Mayor will use his affordable housing grant settlement to augment

²⁷ NLP/VI/001: GLA, London Plan Viability Study, December 2017; and NLP/VI/004: GLA, London Plan Viability Study Addendum Report, November 2018

the number of affordable homes coming forward through planning contributions. The Mayor has also secured agreements from registered housing providers operating in London to bring forward 50 per cent, and 60 per cent in the case of strategic providers, of their new homes as affordable homes. Affordable homes are not subject to the same market absorption constraints as new market homes due to the high demand for affordable housing in London.

- 19.36 Boroughs are not expected to achieve the annualised 10-year housing delivery targets immediately. Rather, they are expected to achieve the change over 10 years. The London Housing Strategy sets out the Mayor's proposals for working with boroughs and other partners to deliver the step change in housing supply required, through:
1. Proactive intervention in London's land market to unlock and accelerate housing delivery, including on public land and through compulsory purchase and other forms of land assembly;
 2. Increased and better-targeted investment to de-risk development and maximise opportunities from new transport infrastructure;
 3. Diversification of the housebuilding industry through increased Build to Rent development, more support for small and medium-sized builders, and more supply from councils and housing associations;
 4. Tackling the construction skills gap and modernising construction methods.
- 19.37 The Mayor proposes further Minor Suggested Changes to clarify that boroughs should consider setting out a realistic stepped housing delivery target over a ten-year period (see Appendix 1).
- 19.38 The tools at boroughs' disposal to meet housing targets are set out in Policies H1 and H2. These include identifying and allocating appropriate sites for residential development, listing these sites on their brownfield registers, site allocations and granting permission in principle on specific sites or preparing local development orders. Boroughs can also increase planning certainty and optimise development capacities at a strategic scale through proactively planning for areas with significant growth potential, including opportunity areas and other areas with growth potential, such as town centres.
- 19.39 Other tools are discussed in the Mayors response to M16 and M17 and include the use of planning conditions that encourage rapid delivery, and the use of viability reviews on consented schemes to ensure permitted schemes are built out rather than 'banked'. As a last resort, boroughs may also exercise their powers to compulsorily purchase land where strategic housing delivery has stalled.

h) Should Table 4.1 include targets for different types and tenures of housing?

19.40 No. To be effective and deliverable the Plan must be flexible in allowing boroughs to meet local housing needs. Policy H12 clarifies that on a scheme-by-scheme basis the findings of the 2017 SHMA should be taken into account, alongside any locally-identified housing requirements that are available. Policy H5 sets a clear strategic target for 50 per cent of new homes to be genuinely affordable and Policies H6 and H7 provide a detailed approach to secure affordable homes on a site-by-site basis, reflecting local needs and the viability of development. Numeric targets for affordable housing delivery are inappropriate as they would not respond to local needs and deliverability, or to viability constraints.

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

19.41 No. London has dynamic land markets and the capacity of different parts of London evolves over time, owing to changes in land-use patterns, the reliance on recycled brownfield land, and enhancement of local infrastructure.

19.42 The SHLAA report provides capacity figures for large sites covering the whole period of the Plan to 2041 and includes a Crossrail 2 scenario. Policy H1 notes that boroughs should consider housing capacity identified in the SHLAA beyond the initial 10-year period when setting local plan targets beyond 2029. However, it is not possible to robustly estimate housing capacity across London beyond 2029 at the London scale.

19.43 Several SHLAA studies have been undertaken to inform previous iterations of the London Plan since 2004. Typically, greater levels of housing capacity have been identified for earlier phases to those which were identified for the same period in an earlier study (when those phases were less immediate). For example, Phase 3 of the 2017 SHLAA (covering a five period between FY 2024 -2029) identified capacity for 176,000 homes; in comparison, Phase 4 of the 2013 SHLAA (FYs 2025 to 2030) identified capacity for only 77,500 homes during this period. As such, housing capacity for the period beyond 10 years will be more effectively identified by boroughs working closely with the Mayor.

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?

19.44 The target reflects London’s identified 10-year housing capacity. However, the shortfall is only 1,000 homes per year, or 1.5 per cent. It is possible the shortfall will be bridged within London through unexpected windfall delivery on large sites that were either not included in the SHLAA or were included but assumed to come forward for redevelopment in later phases.

19.45 A further potential source of additional housing capacity not captured in the SHLAA includes industrial and other commercial land that could become available for residential development through a plan-led approach. This could include intensification of some industrial land to free-up other industrial land for residential development. Some of this capacity could be unlocked within the 10-year housing

delivery target period through a proactive approach to planning where there is strong growth pressure.

- 19.46 LPAs outside London in the WSE will not be expected to deal with any remaining shortfall on an ad hoc basis. For detail on how the Mayor is working with the wider south east see responses to matters 5, 6 and 16.

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

- 19.47 Yes. Boroughs should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.²⁸ Boroughs have access to the SHLAA data and can use identified supply in Phase 4 to inform housing delivery targets beyond 2029/29. Policy D6 sets a framework for assessing the capacity of potential sources of supply.

l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

- 19.48 The draft Plan provides a framework for meeting London's spatial needs, including delivery of the wider public interest of meeting housing needs. It is now widely recognised that London is experiencing a housing crisis, which the Mayor's draft Plan and Housing Strategy seek to address. If the draft Plan targets are adopted, the implication for London boroughs will be that when borough local plans are updated, they will need to reflect the borough-level housing targets in the London Plan.
- 19.49 The London Plan must be prepared in accordance with national policy and there is no mechanism available to the Mayor by which targets can be amended to shelter London Boroughs from any consequences resulting from failure to meet housing delivery targets. The implications of failing to deliver London's housing requirement are set out in national policy and guidance. One consequence for boroughs that fail to meet the housing delivery test is that they will be required to prepare a Housing Delivery Test action plan.

²⁸ NLP/GD/03: DCLG, NPPF, March 2012, Paragraph 47

Appendix 1: M19 Further Suggested Changes

The Mayor is suggesting the following further changes to paragraph 0.0.24 and Policy H1 and supporting text:

- **Bold blue** – new text
- ~~Blue~~ – deleted original plan text
- ~~Purple~~ – deleted minor suggested change text

Change ref no	Policy/para /table/map	Further suggested change
M19.1	0.0.24	The Mayor is legally required to keep the London Plan under review ⁶ . The Key Performance Indicators (KPIs) and approach to monitoring set out in the final chapter of the Plan provide a basis for this ongoing review, allowing an assessment of the effectiveness of the Plan to be made over time. Alongside this, key assumptions which underpin the Plan will also be monitored, in particular population and household growth and employment growth. Significant demographic or employment changes which are likely to persist would trigger a partial or full review of the Plan, as would significant persistent divergence from the performance measures of the KPIs.
M19.2	Table 4.1	Annualised average (deletion of column entitled 'Annualised average')
M19.3	Table 4.2	Annualised average (deletion of column entitled 'Annualised average')
M19.4	4.1.3	To achieve these housing targets the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor's Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11. The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic, and where appropriate, stepped housing delivery target over a ten-year period.

		This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery^{36A}.
M19.5	Footnote 36A	This would also fulfil the requirement of a 'Housing Delivery Test action plan'