

## London Plan Written Representation

<b>Ministry of Housing Communities and Local Government (MHCLG)</b>	<b>Reference ID 2631</b>
<b>Matter Title – Housing requirement</b>	<b>Matter no. 17</b>
<b>Matter Question (s)</b> M17. Is the need for 66,000 additional homes per year identified by the Strategic Housing Market Assessment (SHMA) justified and has it been properly calculated for market and affordable housing having regard to national policy and guidance? In particular: a) What weight, if any, should be given to the revised household projections published in September 2018? b) What weight, if any, should be given to the potential impact of Brexit? c) Has the Mayor adequately considered increasing the total housing figures in order to help deliver the required number of affordable homes in accordance with the PPG (ID 2a-029-20140306)?	

### Summary of Government Response

1. The Government was clear that the London Plan in should aim to meet London's housing needs in full. We welcome the proposed increase of London's housing target in the proposed plan from 42,000 to 65,000 homes a year as a helpful first step towards meeting London's housing needs.
2. However, the Government's consultation response was clear that we do not believe the SHMA methodology reflects the full extent of housing need in London to tackle affordability problems.

### Update since the London Plan Consultation Responses

3. Through footnote 69 to para 214 of the 2018 NPPF, the draft London Plan will be examined against the 2012 NPPF rather than new national policy contained within the NPPF 2018. This means the Mayor can proceed with the current draft London Plan based on the findings of his SHMA housing requirement and the SHLAA housing land availability assessment.
4. Paragraph 33 and Annex 1 of the 2018 NPPF set out that the Government expect plans to be reviewed early where all identified housing need is not being met and to ensure a plan is in place which reflects current national policy.
5. Therefore, once the London Plan has been finalised and published, if the housing requirement set out is significantly lower than that derived from the standard methodology in the 2018 NPPF, then the Mayor would be required to work towards an early review of the London Plan to address this.
6. In relation to question a) paragraph 016 of the National Planning Policy Guidance for the 2012 NPPF, regarding Housing and economic development needs assessments, (Reference ID: 2a-016-20150227) is of relevance. Specifically, it states:

‘Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.’

Note that this Guidance is now archived and available using the following link:  
<https://webarchive.nationalarchives.gov.uk/20180310103648/https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

7. In this context, the Panel’s attention is drawn to pages 6-9 of the Government’s *Technical consultation on updates to national planning policy and guidance* (October 2018, reference NLP/AD/14 in the EIP Library). This is considered to provide relevant background to the level of weight that should be afforded to the revised household projections.

#### **Resolving the Government’s concern**

8. The London Plan could address the Government’s concerns by committing to an early review of this London Plan based on Paragraph 33 of the 2018 NPPF.

Word Count (excluding Question and title/references) = 433 words