

KENSINGTON & CHELSEA LOCAL PLAN PARTIAL REVIEW

Matter 2 – Spatial Strategy Issue 2a: Vision and Strategic Objectives

3. Is it in general conformity with the London Plan?

The London Plan treats London as a single housing market area. It establishes the overall objectively assessed housing need (OAN) and then apportions this among the 35 local planning authorities on the basis of capacity assessed across all of London. The GLA’s housing land supply assessment is largely theoretical exercise based upon assumptions about yields of areas rather than identified land supply.

The OAN for London is 49,000 dwellings per annum (dpa) homes on the basis that London’s backlog (the effect of past housing under-delivery) is addressed over the next 25 years. The OAN for London is 62,000dpa if the backlog is cleared over the next ten years. The OAN figure of 49,000dpa has been agreed to be the appropriate OAN for the current London Plan. However, identified capacity only amounts to 42,000dpa. The London local planning authorities are therefore exhorted by the London Plan Policy 3.3 to identify additional capacity where possible to help close the gap between the OAN of 49,000dpa and identified capacity of 42,000dpa. This is necessary to “close the gap between identified housing need and supply in line with the requirement of the NPPF”. Paragraph 3.19i describes what the London LPAs must do to address Policy 3.3 and exceed the “exceed” the minimum housing targets in Table 3.1 of the London Plan.

The Mayor of London’s Housing SPG provides a description on pages 98 to 103 of how the London boroughs are required to carry out SHMAs to assess need at a local level to complement the GLA SHMA 2013 and to meet and exceed the requirements of Policy 3.3 and in order to meet the requirements of the NPPF.

The K&C Local Plan meets the minimum benchmark figure of 733dpa but goes no further than this. The housing land supply over the next ten years indicates that the Council could over-deliver marginally – 771dpa (based on assessed capacity for 7,718 units overall). Setting to one side the efficacy of the case for shortening the plan period, this represents only a marginal contribution to closing the gap – just an additional 38 homes a year.

Few boroughs are making a contribution to closing London’s strategic housing supply gap as the following table documents.

London Local Planning Authorities: Emerging and adopted housing targets compared to the 2015 London Plan (annual averages)

	Local Plan	London Plan	Increase/shortfall
Bromley	641	641	0
Camden	1120	889	231
Croydon	1644	1435	209
Enfield	798	798	0
Hackney	1599	1599	0
Ham & Fulh	1100	1031	69
Haringey	1502	1502	0

Havering	1170	1170	0
Hounslow	822	822	0
Lambeth	1195	1559	-364
LLDC	1471	1471	0
Redbridge	1149	1123	23
Rich' Upon			
Thames	315	315	0
RBKC	733	733	0
Southwark	2736	2736	0
Sutton	427	363	64
Tower Hamlets	3931	3931	0
Wandsworth	1812	1812	0
Westminster	1068	1068	0
	25233	24998	232

Clearly, the London boroughs are failing to plug the shortfall of housing need across the capital with additional supply despite the reassurances to the contrary by the Mayor. This is mainly because the London local planning authorities argue that meeting the minimum target is all that is required from them. This represents a misreading of the intent of the London Plan.

On the matter of housing supply we do not consider the K&C Local Plan Partial Review to be in conformity with the London Plan.

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