

Meeting:	Strategic Planning Advisory Panel
Date:	Wednesday 4th January 2006
Subject:	Draft London Plan Alterations – Housing Provision Targets – Public Consultation
Responsible Officer:	Group Manager – Planning and Development
Contact Officer:	Dennis Varcoe – Group Planner
Portfolio Holder:	Planning, Development and Housing
Key Decision:	No
Status:	Public

Section 1: Summary

The Mayor has invited comments on the Draft Alterations to the London Plan Housing Provision Targets, which have been prepared following the completion of the 2004 London Housing Capacity Study (“the 2004 Study”). These comments are sought by Friday 20 January 2006. The suggested new target for Harrow is for 4,000 additional homes to be provided in the ten-year period 2007/8 to 2016/17. This report outlines the findings of the 2004 Study, including comments on the methodology and process of developing the final potential capacity figures. It then refers to the levels of housing development that have been achieved in recent years, and anticipated future housing development already identified. On the basis of current and projected performance, the Council can, in principle, meet the target identified for Harrow and should therefore support the target.

Decision Required

For recommendation to Cabinet that the comments contained in this report be submitted to the Mayor as the Council’s response to the Draft London Plan Alterations – Housing Provision Targets – Public Consultation, by 20 January 2006.

Reason for report

The Mayor has prepared draft Alterations to London Plan policies on Housing provision targets based on the 2004 Study. As part of the statutory process, the draft Alterations are the subject of a 3 month public consultation, which started on 17th October. The updated targets eventually included in the London Plan will provide the strategic guidance for the development of policies in the Core Strategy of the Local Development Framework. The Council would wish to respond at this stage.

Benefits

The opportunity for the Council to comment will enable the Mayor the opportunity to feed these into the Examination In Public to be held on the draft Alterations. Targets determined through this process will be statutory, and the Council will need to consider these in the preparation of the Local Development Framework.

Cost of Proposals

The cost of updating information on the 2004 Study, which informs the Alterations, will be met within the approved Departmental budget.

Risks

Failure to comment would expose the Council to suggestions that it was entirely in agreement to the methodology, content and findings of the 2004 Study and all aspects of the draft London Plan Alterations on housing provision targets.

Implications if recommendations rejected

Consideration would need to be given to any further action required to be taken, including if this involved representations that would need to be pursued at the Examination In Public into the Draft London Plan Alterations.

Section 2: Report

2.1 Brief History

Background

The London Plan 2004 includes housing provision targets for the twenty-year period 1997-2016, of which Harrow's contribution is at least 6,620 additional units. This figure was subsequently incorporated into the Harrow Unitary Development Plan (HUDP), adopted in July 2004. The figures included in the Plan were derived from the 1999 London Housing Capacity Study ("the 1999 Study"). Whilst the London Plan figures were agreed following the Examination in Public, it was acknowledged by the Panel that the total annual provision of 23,000 additional units was inadequate. On the basis that additional provision would be required to meet forecast population and household increases, the need for an annual provision exceeding 30,000 units was identified. The 2004

Study was thus undertaken to identify potential capacity, and thereby to help provide an indication as to whether the additional provision required could be achieved in practice.

The 2004 Study.

Methodology

2.1 As with methodologies for previous London Housing Capacity Studies, an approach that could be applied consistently to all Boroughs was developed. Boroughs were afforded the opportunity to comment on the new methodology, and improvements were secured. Whilst there are reservations over certain aspects of the methodology, it is acknowledged that accurately forecasting future levels of housing provision can never be an exact science.

2.2 Much of the site information for the 2004 Study has been recorded on a computerised mapping system developed specifically for the 2004 Study. This is set up as a dedicated web site to which Borough officers had access for a prescribed period. Harrow acted as one of the pilot boroughs in the development of this system. Many of the different components of housing provision identified in previous studies have been included in the 2004 Study, including large sites, small sites, non self-contained accommodation, and vacancies. However, a far wider range of detailed information on individual sites was included in this study to enable an assessment of individual site potential and delivery to be undertaken.

2.3 Large sites - The list of large sites for potential development prepared by the Greater London Authority (GLA) was scrutinised by officers. This significantly reduced the number of sites entered by Harrow officers onto the database to be likely to be brought forward for development. This included a small number of additional sites identified by Harrow officers. A meeting was subsequently held with GLA officers to discuss the individual sites. Provisionally a capacity of 2,324 units for large sites was identified for the ten-year period 2007-2016, equating to annual provision of 232 units.

2.4 Small sites

Estimates of this component were based on past trends on net housing completions, using information from the London Development Monitoring System and Housing Provision Survey information. In addition an 'uplift' component was identified, and borough officers were invited to complete a questionnaire on policy factors that might impact on potential capacity. GLA officers included an uplift of 25%, although at a meeting to discuss the overall study, Harrow officers expressed the view that the uplift was not justified because the policies in the recently adopted HUDP were in general conformity with the London Plan. A capacity of 1,276 units for small sites was identified for the ten-year period 2007-2016, equating to annual provision of 128 units.

2.5 Non self-contained accommodation

Non self-contained capacity comes from a variety of sources, ranging from rooms or bedsits in houses, to new purpose built accommodation such as nurses or student accommodation. The potential capacity from this source, as in previous

studies, has been derived from extrapolation of previous performance. For Harrow, the average annual provision for the period 1997-2003 was 15 units. This has been translated into a forecast capacity of 146 additional units in the ten-year period 2007-2016, or 15 units per annum.

2.6 Vacancies

Estimating the contribution from this source of housing capacity (along with non self-contained capacity) had been a challenging exercise in previous Housing Capacity Studies. Unfortunately, addressing this element has again proved problematic in the 2004 study, to the extent that the GLA fundamentally changed the basis for defining vacant potential during the process (to a proportion of Council Tax identified vacant homes). There are continuing concerns about this element of housing, particularly given that eleven boroughs do not have any figures identified for this component. For Harrow, a figure of 257 units was identified for the ten-year period 2007-2016, equating to annual provision of 26 units.

2.7 Summary of capacity

Table 18 in the 2004 Study sets out the individual borough capacity figures for the individual components discussed above. Harrow's contribution is identified as being 4,002 additional units in the ten-year period 2007/8 – 2016/7, as follows:-

- Large sites	2,324
- Small sites	1,276
- Non self-contained	146
- Vacancies	<u>257</u>
TOTAL	<u>4,002</u>

2.8 Process of developing the final potential capacity figures.

Following the submission of extensive and detailed site information, and a meeting between GLA and Harrow officers, GLA officers then undertook a scenario-testing phase on large site information. This phase did not result in changes to Harrow's figures.

The Draft London Plan Alterations

2.9 Translation of potential capacity into targets

The translation of any capacity study information into firm housing targets must be accompanied by some qualification. There will always be issues relating to whether all identified sites can be delivered, especially as a result of financial considerations. Conversely, even if some sites identified in the Study are not brought forward for development, it is important to realise that a considerable number of sites, not hitherto identified, will come forward for development over the period 2007-2016.

2.10 West London Sub-Region and Harrow targets

Revised Policy 3A.1 in the Alterations re-affirms that policies in boroughs development plans should seek to achieve and exceed the targets identified. Table 3.1 includes a target for Harrow of 4000 additional homes in the period 2007/8-2016/7. This target is part of the West Sub-Region figure of 38,400, which in turn contributes to the London total of 310,900.

2.11 New paragraph 3.14b to Policy 3A.2 states that 'boroughs will be required to demonstrate a housing output trajectory for achieving the annual average over the 10 year plan period'. The Annual Monitoring Report considered by the Panel at its meeting on 1st December 2005 included a housing trajectory which indicated that, on the basis of known planning permissions and identified potential, suggests that the target figure for Harrow would appear to be attainable. Any new development coming forward in the period on hitherto unidentified sites would need to be added to identified capacity.

2.12 Delivering each component of the target.

As with previous housing targets, there has been an implicit assumption that, should boroughs fail to meet their overall housing target, under-performance in any element would need to be compensated for by additional delivery under other components. Whilst this may be theoretically possible, achieving policy objectives may preclude undertaking such action. Indeed, artificially trying to increase one particular component might mitigate against achieving housing or sustainability objectives. It is important to note that any targets included in the London Plan are to be subject to a 5 year review.

2.13 Other possible implications for Harrow

If the revised ten-year figure for Harrow of 4,000 additional homes in the period 2007/8 to 2016/17 and the annual monitoring target of 400 per annum is accepted by the Panel overseeing Examination in Public, one of the implications by default would then be that the target for affordable provision would correspondingly increase from the current 165 units per annum to 200 units per annum (i.e. 50% of the overall target). In practice it has been difficult to achieve even the latter.

2.14 Update

Since the draft Alterations were published, the Government on December 5th 2005 published the revised PPS3 Housing consultation document, the Planning-gain Supplement: a consultation document, the Government's response to the Barker review and the ODPM's plans in respect of making affordable housing more affordable. Consideration will be given to what impact the se proposals, if implemented would be likely to have on housing delivery in Harrow, including affordable housing.

2.15 Conclusions

Although there are reservations about assumptions made on certain aspects of the methodology used in the 2004 Study and its application, it is acknowledged that accurately forecasting future levels of housing provision can never be an exact science. On the basis of available information in the Housing Capacity Study, together with the housing trajectory undertaken as part of the Annual Monitoring Statement, it is suggested that the target identified for Harrow is achievable. Clearly this also assumes that there will not be any significant downturn in the economy that would inhibit housing development. Monitoring of levels of development taking place under each component of supply should quickly identify if any additional provision above the identified level, (or shortfall) is occurring. This will inform the next 5 year review.

In accepting that the target would appear to be achievable, the Council is mindful that, following consideration of all the Boroughs' responses adjustments, including reductions in some individual Borough targets may be agreed by the Mayor. Based on experience with previous studies and pursuant targets, this has resulted in the need to seek additional provision from some boroughs to ensure that the overall target is still met. The Council therefore wishes to clearly state that it would not accept any proposal which would result in any target in excess of 4000 units being sought.

2.16 Options considered

The preparation of a separate Council response has been pursued, although consideration of a joint West London response was considered, but deemed to be unrealistic to achieve.

2.17 Consultation

None.

2.18 Financial Implications

Costs are contained within the approved Departmental budget.

2.19 Legal Implications

The Council is, by virtue of the Greater London Authority Act 1999, a statutory consultee in the process of the alteration or replacement of the spatial development strategy (the London Plan). The outcome of the Government's recent consultation documents on the revised Planning Policy Statement No. 3 Housing and the new Planning-gain Supplement are still awaited.

2.20 Equalities Impact

The Draft London Plan Alterations, by seeking to secure delivery of housing targets, promotes equality of opportunity, housing choice, and social inclusion.

2.21 Section 17 Crime and Disorder Act 1998 Considerations

Any design constraints on housing sites relating to crime would have been included in the 2004 London Housing Capacity Study, which informed the London Plan Alterations.

Section 3: Supporting Information/Background Documents

Background Documents: Draft Alterations to the London Plan – Housing Provision Targets, Waste and Minerals – public consultation (July 2005, and October 2005).

Revised PPS3: Housing consultation document (5th December 2005)

The Planning-gain Supplement: -consultation document (5th December 2005)

The Government's response to the Barker review (5th December 2005)

The ODPM's plans in respect of making affordable housing more affordable (5th December 2005).