

M5. Irrespective of matter M4, did the Mayor engage constructively, actively and on an on-going basis during the preparation of the Plan:

a) with all relevant local authorities and other prescribed bodies in London;

During much of the preparation of the draft London Plan, the Mayor of London and the Greater London Authority (GLA) worked extensively and constructively alongside the London Borough of Newham (LBN) on a number of shared work streams. This was to the benefit of both the draft London Plan and the emerging LBN Local Plan and included producing joint evidence base documents in relation to employment land supply and demand¹.

Conversely and unfortunately, LBN's experience in the production of the Strategic Housing Land Availability Assessment (SHLAA, 2017) has been far less transparent on the part of the GLA. This resulted in a final housing target that was not reached in agreement with LBN, in contrast to previous practice. LBN take this opportunity to seek closer working relationships with the GLA on this matter going forward to enable evidence based assessment of housing capacity.

In the context of a housing market area such as London where housing need will always outstrip supply and hence where capacity derived housing targets are the accepted norm for the appropriate apportionment of delivery, it is essential that the boroughs take the lead role in evaluating what can be delivered at the local level, as part of their strategic responsibilities. Prior to beginning formal work on the SHLAA, the GLA carried out a number of preparatory exercises including a Call for Sites (March - June 2016), a consultation on the draft SHLAA methodology (Nov 2016 – Jan 2017), and SHLAA system cleansing. LBN received clear communication on these elements throughout.

The more formal process of LBN feeding data into the SHLAA system, carrying out an extensive review of the borough's deliverable large sites (including an evaluation of constraints and consideration of potential on-site land use mix) began in Autumn 2016, and continued until April 2017. In April LBN attended a One-to-One session with the GLA to finalise capacity assumptions, inclusive of any non-self contained accommodation in the pipeline, which together with a typical modest delivery from small sites (using past windfall trend data), was understood would result in the final housing target.

Discussions on small site capacities took place in May 2017, and involved analysing past windfall (c. 200-300 annually depending on years averaged), removing any potential double counts which has already been included in large site capacity assertions. Through this work it was understood by LBN that an overarching capacity-derived housing target for the borough had been identified.

¹ Employment Land Review Part 1: Sites Audit (November 2017)
Employment Land Review Part 2: Demand Assessment (November 2017).

In September 2017, several months since the collaborative discussions with the GLA, LBN received a final housing target which included a 9500 unit uplift from small sites, derived through pan-London modelling. This was additional to capacities agreed prior, estimated through intensification of existing residential areas without analysis of their individual contexts. Not only was such an uplift significantly higher than previous evidenced delivery, but its broad brush approach is not supported by Local Plan policy. As such the Council have made clear through our representation on the draft London Plan that the LBN housing target is neither achievable or justified all of which is discussed in more detail in Matters 19 and 20.

Moreover, the methodology had not been included in any prior discussions, nor was it consulted upon during the draft SHLAA Methodology consultation (date to Jan 2017). As such, the boroughs have not been afforded the opportunity to discuss the methodology, its deliverability, limitations or implications for the wider spatial development strategy (in light of the Government's new HDT) particularly in relation to affordable housing and infrastructure requirements.

Having arrived at a significantly uplifted housing target through independent, non-collaborative work not endorsed by LBN, failing to consult adequately and providing no opportunity to discuss either the method or resultant policy, LBN consider that the Mayor of London did not engage sufficiently constructively, actively and on an on-going basis during the preparation of the Plan.