

Local Plan Authority Monitoring Report - Housing Interim Position Statement

Planning

30 September 2020

Local Plan Authority Monitoring Report - Housing Interim Position Statement, September 2020 Covering financial year 2019/20

This is an interim statement, accompanied by a spreadsheet summarising data outputs in charts and tables, as well as further site information. The implications of Covid-19 resulted in a delay to the completion of site surveys. The final version of the new London Plan was expected to be adopted in summer 2020 and is still awaited. A full Housing AMR is expected to be published later in the year.

Housing starts, completions and pipeline

The London Borough of Richmond upon Thames's housing target is set in the London Plan. The Further Alterations to the London Plan (FALP) confirmed in the published (i.e. adopted) consolidated London Plan (March 2015) a target of 3150 for 2015-2025, which is equivalent to 315 additional homes per year.

Net additional dwellings for the reporting year

A net gain of 332 units was completed in 2019/20.

Future Housing Supply and Implementation Strategy - Housing Trajectory as at 1st April 2020

Tables 1 and 2 show that past London Plan requirements have been significantly exceeded.

The results of the 2018 Housing Delivery Test for Richmond showed 1,332 homes delivery 2015/16 to 2017/18 against 945 homes required, a measurement of 141% and therefore no action required. The results of the 2019 Housing Delivery Test for Richmond showed 1,147 homes delivery 2016/17 to 2019/20 against 945 homes requirement, a measurement of 121% and therefore no action required.

The FALP housing target is rolled forward until it is replaced by a revised London Plan target. A full review of the London Plan has been underway. The Mayor considered the Inspectors' recommendations and, on 9 December 2019, issued to the Secretary of State his intention to publish the London Plan. The Secretary of State responded and issued Directions on 13 March 2020, and the Mayor responded to the Secretary of State on 24 April 2020. The current stage¹ is to informally agree text of new London Plan with MHCLG and Secretary of State, before it can be finalised. Although at an advanced stage, the final format of the Plan is not known, and parts of the housing policies are under discussion between the Mayor of London and the MHCLG. It is expected that the new London Plan will set a new 10 year housing target of 4,110 for net housing completions (2019/20 -2028/29), and a 10 year target (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size) of 2,340 homes.

The NPPF requires Local Planning Authorities to identify and maintain a rolling 5-year housing land supply. Sites for inclusion should be specific, deliverable – the NPPF definition sets out sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years, with further guidance in national Planning Practice Guidance². Each site has been assessed for its deliverability, in discussions with officers in development management and using monitoring resources, for clear evidence that completions will begin within five years, to accord with NPPF and PPG guidance. Tables 3 and 4 in the accompanying spreadsheet show the Council has identified a potential 2,208 units over the 5-year period (2020/21 to 2024/25), which exceeds the target in the London Plan 2015 and the target in the emerging new London Plan. This includes the NPPF requirement of an additional buffer of 5%.

¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>

² <https://www.gov.uk/guidance/housing-supply-and-delivery>

Also taken into consideration:

Recovered appeal: land to the east of Newport Road and to the east and west of Cranfield Road, Woburn Sands (ref: 3169314 - 25 June 2020)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/894813/Combined_DL_IR_R_to_C_Newport_Road_Woburn_Sands.pdf

East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government

<https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/CO009192020.pdf>

At the time of writing, the longer-term implications arising from the Covid-19 pandemic remain uncertain, however nationally appeal decisions to date have recognised the 5-year supply is concerned only with the number of deliverable sites, and that figure is entirely separate from the number of houses actually built and occupied, and that effects may be short-term. Appeal Decisions

APP/A1530/W/20/3248038 <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=38702825> and APP/K0235/W/19/3243154

<https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=39035748>

The new London Plan (as expected to be published 2020) includes Policy H2 Small Sites seeking to expand supply from this current underutilised source. London Plan Policy H2 sets out that boroughs should pro-actively support well-designed new homes on small sites, including through planning decisions, and should recognise in their development plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites. The detailed approach in the London Plan will, once finalised, have full weight in decision-making.

The supporting text in the London Plan sets out that incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites. It states this can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. It is therefore justified to consider an increase in small sites delivery in the borough, compared to the average in recent years. Further detailed design guidance to aid policy implementation is being prepared by the GLA (see the pre-consultation draft Good Quality Homes for all Londoners SPG³), which takes a design-led approach to make the most of the land available.

The new small sites target for the borough at Table 4.2 in the London Plan, equating to 234 homes per annum, sets a minimum baseline which the GLA expects to be exceeded, particularly in outer London, as paragraph 4.2.6 sets out it represents a small amount of the potential for intensification. The London Plan at paragraph 4.1.8 states that “The allowance for windfall sites (that are not specifically identified) is considered appropriate given the policy framework set out in the London Plan; the capital’s reliance on recycled brownfield sites in other active land uses; and the number of additional homes expected to be provided via incremental intensification of existing residential areas”. It recognises that because of the nature of some sites, including the particular incremental characteristics of small sites, boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the numbers set out in Table 4.2. It is therefore considered appropriate to include a windfall of 234 homes per annum from years three to five in the five year housing land supply. Average net completions on small sites 2013/14 to 2019/20 have already been averaging 177 homes per annum.

In addition, higher windfall assumptions are considered justified due to the Government’s introduction of further Permitted Development Rights⁴ – making it easier to extend certain buildings upwards to increase housing density⁵ and the residential redevelopment of vacant and redundant buildings⁶. These were part of radical reforms to the planning system announced by the Government⁷ to give greater freedom to create new homes, to kickstart the construction industry and speed up housebuilding by removing unnecessary red tape.

Work on the new Richmond Local Plan has also commenced⁸, with a Direction of Travel consultation⁹ completed in Spring 2020 including a call for sites. 32 responses were received on the call for sites and will be considered in progressing the preparation of the new Local Plan, including site allocations, to positively plan for delivering housing and other future needs. The Council’s recent Affordable Housing Update to the Adult Social Services, Health and Housing Committee on 8 September 2020¹⁰ estimates 182 affordable homes completing 2021/22 to 2022/23 as forecasts currently stand, and notes estimates of delivery over the next ten years identify the potential to now deliver well over 1,000 affordable homes.

³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/good-quality-homes-all-londoners-spg-pre-consultation-draft>

⁴ Future monitoring to keep under review. At the time of writing, applications for upwards extensions have already been received by the Council.

⁵ <https://www.gov.uk/government/publications/permitted-development-rights-and-changes-to-the-use-classes-order/fast-tracked-approval-for-building-upwards-key-facts-brief>

⁶ <https://www.gov.uk/government/publications/permitted-development-rights-and-changes-to-the-use-classes-order/fast-track-planning-for-brownfield-regeneration-key-facts-brief>

⁷ <https://www.gov.uk/government/news/pm-build-build-build>

⁸ In accordance with the Local Development Scheme adopted July 2019

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/local_development_scheme

⁹ https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/new_local_plan_direction_of_travel_engagement

¹⁰ <https://cabnet.richmond.gov.uk/documents/s86420/LBR%20Affordable%20Housing%20Update%20Report%208-9-20.pdf>

<https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=798&MId=4917>