

Matter 6: Are the housing requirements set out in the plan justified, consistent with national policy, and in general conformity with the London Plan?

Issue(i) Is the stepped requirement included in the plan justified, would it be in general conformity with the London Plan, and is the approach consistent with national policy?

1. Taking into account the considerations set out in the PPG⁵⁸ and the London Plan⁵⁹ and in the light of the Council's response to our preliminary letter and associated proposed MMs:

a. Would the stepped housing requirements expressed in either the Regulation 19 version of the Plan or proposed MMs provide an effective and positively prepared strategy for meeting housing needs over the plan period?

Council response

6.1. Yes, the stepped housing requirements as set out in the Regulation 19 version of the Local Plan with the latest associated proposed Main Modifications would provide an effective and positively prepared strategy for meeting housing needs over the plan period.

6.2. Paragraph 4.1.10 of Document [0D32 the London Plan](#) 2021 states "... *The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.*[footnote 45 – this would also fulfil the requirements of a Housing Delivery Test Action Plan] Merton's stepped housing requirements are in general conformity with [0D32 the London Plan](#) and [Document 11D10 Merton's Housing Delivery Test Action Plan](#), which also helps to provide the evidence required from paragraph 4.1.10 of the London Plan for general conformity.

6.3. The stepped housing requirements are also positively prepared and effective. As well as working with the Mayor of London on [Document 11D2 London's Strategic Housing Land Availability Assessment](#) and the London Plan itself, the council has also worked closely with other boroughs.

6.4. At Stage 2 of Merton's Local Plan (Regulation 18: October 2018 – January 2019), the council consulted on a housing target that was based on 411 homes per annum derived from the then adopted London Plan (2016) and was not stepped.

⁵⁸'Housing Supply and Delivery' Paragraph: 021 Reference ID: 68-021-20190722 Revision date: 22 July 2019

⁵⁹ At paragraph 4.1.10

6.5. As stated in [Document 0D13 Duty to Co-operate](#) and found in more detail in [Document 0D13f 2019 Correspondence with other Local Planning Authorities on housing matters](#) (part of LBM01) in late 2019, Merton's total housing target proposed by the Mayor of London in the then Draft London Plan ranged from 9,180 to 13,280 homes in 10 years, which, at the time, the council identified that it would have been unable to meet. As well as responding to the London Plan consultations challenging the methodology for small sites. Merton wrote to 19 other Local Planning Authorities within and outside London to ask if they could help contribute to meeting Merton's share of London's new homes, as proposed in the then draft London Plan. Of the councils who responded, none stated that they would be able to help meet Merton's unmet need.

6.6. In [Document 0D15 Stage 2a consultation \(second Regulation 18\): November 2020 – February 2021](#)), and in line with the then draft London Plan which was adopted on 1st March 2021, the council proposed a stepped approach to meeting its housing requirements. Those requirements were based on the housing target of 918 new homes per year which was eventually published on 1st March 2021 in the London Plan 2021. The stepped approach is considered positively prepared and effective; it is based on effective joint working other local planning authorities and the Mayor of London and it is deliverable over the plan period.

b. have reasonable alternatives been taken into account in arriving at the stepped requirement?

Council response

6.7. Yes, reasonable alternatives have been taken into account in arriving at the stepped requirement. The council considered taking the approach of having the same target every year (i.e. 918 homes annually) to reach a minimum of 9,180 homes by 2028-29 as set out in [0D32 London Plan 2021](#) Table 4.1 *10 year targets for net housing completions (2019-20-2028-29)*. However, this wasn't considered a reasonable approach due to the delivery profile of Merton's larger development sites. The regeneration programme for Eastfields, High Path and Ravensbury requires the demolition of homes as well as their construction; for example over 300 homes will be demolished across the three estates during the first five years and more homes will be constructed from years 5 to 15. Therefore, the stepped approach to meeting Merton's targets is justified. The Local Plan consultation at stage 2a (Regulation 18) contained the stepped approach. As set out in the response to Matter 6, Question (i) (a) above the stepped approach to delivery is supported by the London Plan 2021. As demonstrated by [Document 0D15 Local Plan at Stage 2a](#) and [LBM02 Stage 3 \(Regulation 19\) incorporating Main Modifications](#) the council has also considered reasonable alternatives within the stepped approach as led by updating information on housing delivery.

c. is the use of a stepped housing requirement appropriate?

Council response

6.8. Yes, the use of a stepped housing requirement is appropriate. As set out in the response to Matter 6, Question (i) (b) above, the stepped housing requirement to reach the London Plan target plus buffer by 2028-29 is in general conformity with the London Plan, is based on proportionate evidence of housing delivery (particularly demolitions and construction during estate regeneration) and takes into account reasonable alternatives.

d. what is the justification for the requirements set out for each year of the plan period?

Council response

6.9. As set out in the updated housing trajectory and the collective information provided on housing delivery (including responses to Matter 7 dated 20th May 2022) there are a number of sites in Merton including estate regeneration construction where delivery is usually programmed for years c6-9 Therefore delivery in these years are higher than other years based on evidence of housing delivery forecasts, particularly dialogue with landowners and developers but also having regard to the information summarised in [11D6 Merton's Housing Delivery Study](#) on historic delivery trends. The first five years are based on evidence that sites are suitable, available and achievable, as required by the NPPF. The detailed justification for deliverable sites is set out in [Housing Proforma Type A and Type B sites \(submitted 2nd March 2022\)](#) and is updated by the council's responses to Matter 7. Other sites in the plan beyond the first five years are developable, as required by the NPPF and defined in the NPPF glossary.

2. Is the stepped housing requirement supported by a clear articulation of how homes will be delivered and any actions that will be taken in the event of under-delivery⁶⁰? How would proposed MMs ensure general conformity with the London Plan in this regard, and the effectiveness of the Plan in terms of its deliverability over the plan period?

Council response

6.10. Yes, the stepped housing requirement is supported by a clear articulation of when homes will be delivered as required by paragraph 4.1.10 of [Document 0D32 London Plan 2021](#). This is contained in Policy H11.2 including all Main Modifications including MM1.1 and any actions that will be taken (pages 348, paragraph 11.2.7 and 4.2.2 and paragraph 11.2.8 and Figure 4.2.1 Merton's Housing Trajectory).

⁶⁰ Per paragraph 4.1.10 of the London Plan

- 6.11. The actions that will be taken in the event of under delivery are set out in [Document 11D10 Merton's Housing Delivery Action Plan](#) as required by paragraph 4.1.10 of [Document 0D32 London Plan 2021](#).
- 6.12. The proposed MM1.1 for Policy H11.2 (pages 348, paragraph 11.2.7 and 4.2.2 and paragraph 11.2.8 and Figure 4.2.1: Merton's Housing Trajectory 2022/23 - 2037/38 ensures general conformity with the London Plan by clearly articulating the stepped trajectory and provides clarity as to how the London Plan target has been derived beyond the London Plan 10-year period. In particular both tables in MM1 (pages 348, paragraph 11.2.7 and 4.2.2 and paragraph 11.2.8 and Figure 4.2.1 Merton's Housing Trajectory) demonstrates that the delivery of Merton's local plan housing requirement for the Plan period is met.

3. Are the overall requirement and the requirements relevant to specific years clearly expressed in the Plan's policies so that it is evident how a decision maker should react to development proposals?

Council response

- 6.13. Yes, the overall requirement and the requirements relevant to specific years are clearly expressed in Policy H11.2 Figure 11.2.1 *Merton's Housing trajectory for the local plan period 2022/23- 2036/37* and in Figure 11.2.2 *Merton's stepped housing delivery target* which can be found in Merton's Local Plan incorporating proposed Main Modifications updated 20th May 2022.

Issue(ii) Are housing requirements set out for the latter years of the plan justified, and in general conformity with the London Plan in these regards?

1. How have the housing requirements set out in the Plan for 2029/30 onwards

a. Drawn on the 2017 London SHLAA findings and any local evidence of identified capacity?

Council response

6.14. Para 4.1.11 of OD32 London Plan states *If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.*

6.15. Table 4.2 of [OD32 the London Plan](#) sets each boroughs' 10 year housing target for net completions on small sites, which is derived from [11D2 London Strategic Housing Land Availability Assessment](#). This target in Table 4.2 for Merton is 2,610 homes in 10 years which is an average of 261 homes per year.

6.16. In considering the housing requirements set out in the Plan from 2029/30 onwards, the council has drawn from the 2017 SHLAA ([11D2](#)) and taken into account the local evidence of identified capacity. Looking at historic delivery trends on completions, the average number of completions on small sites in the five years 2016-17 to 2020-21 is 341 homes on small sites, 131% of the London Plan small sites target of 261 homes per annum as set out in Table 4.2. This helps to justify the delivery of an average of 261 homes per annum on small sites into the future. The 10 year average (2011/12 to 2021/22) delivery on small sites is 277 homes per year, 106% of the London Plan's small site target of 261. Other local evidence of capacity that has been taken into account includes Clarion's programme for the regeneration of Eastfields, High Path and Ravensbury, which extends beyond 2029/30.

b. Taken into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements?

Council response:

6.17. The council can confirm that there are no committed transport infrastructure improvements which can be considered to provide demonstrable additional capacity for new homes beyond 2028/2029 that have not already been taken into account, as per [14D4 Merton's Infrastructure Delivery Plan 2021](#), Transport for London's representations on Merton's Local Plan (for example, those contained in [Document OD6 Schedule of Representations to Merton's Local Plan](#) and in [Document OD7 Completed copies of all Regulation 19 representations Stage 3 July-Sept 2021](#)), Merton's Local Plan policy T16.6 and Table 16.1 *Indicative list of transport schemes* (including the associated

Modifications to this policy and table).

- 6.18. Merton will continue to work proactively and collaboratively with the Mayor of London in contributing to addressing much needed additional homes for London.

c. Rolled forward the housing capacity assumptions applied in the London Plan for small sites?

Council response:

- 6.19. Table 4.2 of the [0D32 the London Plan](#) sets each boroughs' 10 year housing target for net completions on small sites, which is derived from [11D2 London Strategic Housing Land Availability Assessment](#). This target in Table 4.2 for Merton is 2,610 homes in 10 years which is an average of 261 homes per year.

- 6.20. In considering the housing requirements set out in the Plan from 2029/30 onwards, the council has drawn from the 2017 SHLAA ([11D2](#)) and taken into account the local evidence of identified capacity. Looking at historic delivery trends on completions, the average number of completions on small sites in the five years 2016-17 to 2020-21 is 341 homes on small sites, 131% of the London Plan small sites target of 261 homes per annum as set out in Table 4.2. The 10 year average (2011/12 to 2021/22) delivery on small sites is 277 homes per year, 106% of the London Plan's small site target of 261. This helps to justify that the delivery of an average of 261 homes per annum on small sites into the future is robust and based on evidence.