

Mr Fort and Mr Aston

Via programme officer email
programmeofficer@carmeledwards.com

FutureMerton
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Direct Line: 020 8545 4855

Date: 19 January 2024

Dear Mr Fort and Mr Aston,

Response to letter INSP24

1. Thank you for your letter dated 8th January 2024 which we received via the Programme Officer on 15th January 2024.

Planning policy for Traveller Sites

2. We support the pragmatic approach set out in your letter to help address government's new December 2023 policy direction on Planning Policy for Traveller Sites while progressing Merton's new Local Plan in a timely manner.
3. We are working on Main Modifications (MMs) to the draft Local Plan address this matter alongside which we are undertaking Sustainability Appraisal, Habitats Regulations Assessment and Equalities Impact Assessment. We also welcome your confirmation that you are content with the remainder of the Main Modifications as drafted.
4. We are currently working with the Mayor of London and all other London boroughs on a London-wide evidence base in planning for traveller sites, which will take account of government's new Planning Policy for Traveller Sites published in December 2023.

Housing Delivery Test

5. As stated in paragraph 13 of your letter INSP24, Merton's Local Plan examination has been based on a 20% buffer applied to the 5-year supply of housing sites.
6. For information, we wrote to the Secretary of State on 22nd December 2023 to request a substantial data change to Merton's entry in the 2022 Housing Delivery Test (HDT) in line with the UK Statistic Authority's Code of Practice.

7. One of the omissions is that government's HDT 2022 measurement for Merton omits 404 homes that were built in the London Borough of Merton during 2021-22 (deriving from the completion of a single large site adjacent to Wimbledon Stadium (14/P4381 as amended)). The revised data was submitted to DLUHC via the Greater London Authority on 4th July 2023, but this has not been used in the published Housing Delivery Test 2022.
8. At the time of writing, we have not received a response from the Secretary of State. Our letter to the Secretary of State is available online and included as Appendix A to this letter.

London Housing Delivery

9. We note the Written Ministerial Statement and the [associated Secretary of State letter dated 18th December 2023 to the Mayor of London](#) in respect of housing delivery in London. Together with all London Boroughs we will continue to work with the Department of Housing, Levelling Up and Communities and the Mayor of London towards meeting housing needs.
10. Please don't hesitate to let me know if you have any comments or questions as a result of this letter.

Yours sincerely,

Tara Butler
Deputy Head of FutureMerton
Email: tara.butler@merton.gov.uk

Appendix A – letter from London Borough of Merton to the Secretary of State dated 21st December 2023 requesting a substantial change to the data reported for Merton’s Housing Delivery Test 2022

Rt Hon Michael Gove MP
Secretary of State for Levelling up Housing &
Communities
Minister for Intergovernmental Relations
2 Marsham Street
London SW1P 4DF

Housing and Sustainable Development
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Direct Line: 020 8545 3365

Date: 21/12/2023

Sent by email michael.gove.mp@parliament.uk

Dear Rt Hon Michael Gove MP,

Housing Delivery Test 2022 – London Borough of Merton request for unscheduled correction

Thank you for publishing the Housing Delivery Test (HDT) 2022. I am writing to request a substantial change to the data reported for the London Borough of Merton as practicable, in line with the UK Statistics Authority's Code of Practice.

The HDT 2022 Measurement published on 19th December 2023 omits 404 homes that were built in the London Borough of Merton during 2021-22. These homes are derived from the completion of a single large site adjacent to Wimbledon Stadium (14/P4381 as amended). The revised data stating that 921 new homes were delivered was submitted to DLUHC via the Greater London Authority on 4th July 2023, but this has not been used in the published Housing Delivery Test 2022.

We also request a correction to the housing requirement for 2019-20. In accordance with the HDT Rulebook, the homes required for the London Borough of Merton should be calculated using the London Plan 2016 target of 411 new homes, reduced by one month to account for the disruption caused by Covid. This was published in the [HDT 2020](#) measurement as 377 homes.

Table 1 and Table 2 set out the difference between the published and correct data.

The published statistics have a material effect on the quality and thus reliability of the HDT Measurement 2022 and the subsequent consequence for the London Borough of Merton is the presumption in favour of sustainable development. The failure to correct these statistics will have a major impact on planning in our borough.

My team are happy to support and answer any queries your team may have in considering our request. I look forward to hearing from you at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lucy Owen', with a long horizontal stroke extending to the right.

Lucy Owen
Executive Director of Housing and Sustainable Development
Email: lucy.owen@merton.gov.uk

cc.

- Neil Higgins, Department of Levelling Up, Homes and Communities
Neil.Higgins@levellingup.gov.uk
- Alex Green, Greater London Authority alexandra.green@london.gov.uk
- planningdata@london.gov.uk
- correspondence@levellingup.gov.uk
- housingdata@levellingup.gov.uk

Table 1: Published HDT Measurement 2022 Figures

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2022 measurement	Housing Delivery Test: 2022 consequence
	2019-20	2020-21	2021-22		2019-20	2020-21	2021-22			
Merton	526	611	918	2055	346	604	517	1467	71%	Presumption

Table 2: Correct HDT Measurement 2022 Figures

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2022 measurement	Housing Delivery Test: 2022 consequence
	2019-20	2020-21	2021-22		2019-20	2020-21	2021-22			
Merton	377	611	918	1906	346	604	921	1871	98%	None
	As published in 2021 HDT measurement - 11 months of 411 - London Plan 2016 target	As published in 2022 HDT measurement - 8 months 918 – London Plan 2021 target	London Plan 2021 target				Figure re-submitted to DLUHC by GLA in June 2023. Extra 404 homes related to partial completion of Wimbledon Stadium planning ref 14/P4361	Updated figure	Updated figure	Updated consequence

