

## Matthew Davidson

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**From:** Jonathan Murch <jonmurch@daviesmurch.co.uk>  
**Sent:** 07 December 2020 12:04  
**Subject:** FW: GLA correspondence

**From:**Celeste Giusti <Celeste.Giusti@london.gov.uk>  
**Sent:**17 August 2020 09:27  
**To:**Valerie Mowah <Valerie.Mowah@merton.gov.uk>  
**Cc:**James Gleeson <James.Gleeson@london.gov.uk>; Tara Butler <Tara.Butler@merton.gov.uk>; Katharine Fox <Katharine.Fox@merton.gov.uk>  
**Subject:**RE: Queries - London Plan Housing Policies

Hi all

Sorry for not getting this to you on Friday. Please find a response to your questions below.

Thanks

Celeste

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**From:**Valerie Mowah <Valerie.Mowah@merton.gov.uk>  
**Sent:**14 August 2020 18:25  
**To:**Celeste Giusti <Celeste.Giusti@london.gov.uk>  
**Cc:**James Gleeson <James.Gleeson@london.gov.uk>; Tara Butler <Tara.Butler@merton.gov.uk>; Katharine Fox <Katharine.Fox@merton.gov.uk>  
**Subject:**RE: Queries - London Plan Housing Policies



Hi Celeste,

Thank you for taking my call today where you advised that clearance from your AD on your draft response to my questions was still being awaited, but that I would be receiving your response imminently.

As advised I am now on leave, therefore have copied in two of my colleagues who are also working on the project to which these responses are sought.

Kind regards

Valerie

	<p><b>Valerie Mowah</b> Principal Spatial Planner 020 8545 3053 valerie.mowah@merton.gov.uk</p>	
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**From:**Celeste Giusti <[Celeste.Giusti@london.gov.uk](mailto:Celeste.Giusti@london.gov.uk)>  
**Sent:**12 August 2020 13:09

**To:**Valerie Mowah <[Valerie.Mowah@merton.gov.uk](mailto:Valerie.Mowah@merton.gov.uk)>  
**Subject:**RE: Queries - London Plan Housing Policies

Hi Valerie

I'm about to send this to be cleared and have asked for a response in the next two days.

I'll forward as soon as its been cleared

thanks

Celeste

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**From:**Valerie Mowah  
**Sent:**07 August 2020 11:42  
**To:**Celeste Giusti ([celeste.giusti@london.gov.uk](mailto:celeste.giusti@london.gov.uk)) <[celeste.giusti@london.gov.uk](mailto:celeste.giusti@london.gov.uk)>  
**Cc:**[james.gleeson@london.gov.uk](mailto:james.gleeson@london.gov.uk)  
**Subject:**RE: Queries - London Plan Housing Policies

Hello Celeste ,

I would be most grateful if you could advise when you are likely to provide a response to the queries raised below please?

Kind regards

Valerie



**Valerie Mowah**

Principal Spatial Planner  
020 8545 3053  
[valerie.mowah@merton.gov.uk](mailto:valerie.mowah@merton.gov.uk)



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**From:**Valerie Mowah  
**Sent:**31 July 2020 15:15  
**To:**Celeste Giusti <[Celeste.Giusti@london.gov.uk](mailto:Celeste.Giusti@london.gov.uk)>; [james.gleeson@london.gov.uk](mailto:james.gleeson@london.gov.uk)  
**Subject:**FW: Queries - London Plan Housing Policies

Hello Celeste and James,

I hope this e-mail finds you both well.

We are currently dealing with challenges raised in connection with an appeal case regarding the council's application of the adopted 2016 London Plan (LP) Housing Target for the borough set out in Table 3.1 to which we would be grateful for your assistance in responding to the following questions ( set out in no particular order):

1. Whilst it is acknowledged that the Intend to Publish LP is at an advanced stage, as per paragraph 47 of the NPPF, the council believe that the 2016 LP is still the appropriate development plan for determining the housing need in London and is in place until the new London Plan is published which is envisaged to be in the next nine months (in the absence of any published timetable). Please can you advise whether LBM's approach fits with the requirements of paragraph 11b of the NPPF (2019) and therefore is not relevant to engage NPPF para 11d?

Despite the London Plan 2016 forming part of Merton's Development Plan, the ItP London Plan provides the most up to date policies. Officers at the GLA consider that the ItP London Plan housing targets (which cover the period 2019/20 to 2028/29 based on the London SHLAA and Panel report) have significant material weight as they reflect the Panel recommendation and have not been subject to a Direction from the SoS (see letter dated 13 March 2020 on the GLA web-site). Given the Mayor has accepted the Panel recommendation to reduce London's overall housing target, the ItP (and therefore the 2016 LP given its lower housing target) no longer meet OAN – as set out by the 2017 London SHMA. In line with para 13 of the PPG (Housing and Economic needs assessments), it is for the Mayor to distribute London's housing target. In addition paras 0.0.21 and 0.0.22 of the ItP LP state

*The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their local plan development.*

*The Plan does not meet all of London's identified development needs. Work will need to be undertaken to explore the potential options for meeting this need sustainably in London and beyond. This is a matter for a future Plan, and requires close collaboration with local and strategic authorities and partners.*

The ItP London Plan provides the most up to date policies based on the most up to date evidence for planning in London. The ItP London Plan targets (Table 4.1) begin from 2019/20 based on the London SHLAA 2017 and the Panel Report.

2. Does the 2016 LP housing targets set out in table 3.1 take account of objectively Assessed Need (OAN) and if so how and where?

Table 3.1 of the London Plan was based on housing capacity identified by the 2013 SHLAA. This very closely aligned with the OAN identified by the 2013 London SHMA. However, the 2017 London SHMA sets out the most up to date OAN for London, with a need of 66,000 additional homes per year. The methodology for the 2017 SHMA was accepted by the last London Plan Examination Panel. This supersedes the 2013 London SHMA.

3. Are the 2016 LP housing targets set out in table 3.1 still relevant given that it precedes the updated NPPF (2019) para 60 which requires *strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*. Does the 2016 LP qualify to apply exceptional circumstances and if so what are these and why? Or does NPPF (2019) para 11d apply regarding the strategic housing policies ( including Table 3.1) in the 2016 LP ?

This question is not relevant for a Local Plan in London. As stated above, the London Plan sets the London borough housing targets. Individual London borough housing targets are informed by the London SHLAA with the aim of meeting London's overall OAN. This is a process and methodology that has been accepted by the current and previous London Plan Examination Panels (report available on the London Plan EiP web-site). Whilst the London Plan 2016 forms part of Merton's Development Plan, the housing targets in the ItP London Plan have significant weight given the advanced stage of the document, the figures are in line with the Panel report, and are not subject to a Direction from the SoS. The ItP LP will be published soon (the Mayor has responded to the SoS Directions) and the new London Plan will be the most up to date document forming Merton's development plan.

4. Do the 2016 LP housing targets set out in table 3.1 take account of housing backlog and if so how and where?

Yes, it did. See Chapter 7 of the 2013 SHMA. The 2017 SHMA also took into account backlog.

5. If the answer to (1) is no, please can you advise how boroughs should address backlog – e.g. do boroughs need to make periodic adjustments to the housing targets set out table 3.1 of the 2016 LP and if so does the GLA publish these adjusted targets?

As noted above, the 2017 SHMA took backlog into account when arriving at its estimate of London's housing needs for the emerging London Plan.

6. When and how should boroughs apply the updated housing targets set out in the Intend to Publish LP ( table 4.1), particularly given these are 10 year targets running from 2019/20 to 2028/29?

Boroughs should be planning for the ItP LP target (starting in 2019/20) through their revised Local Plans and allocate sufficient land to address this target in line with ItP LP policies H1 and H2, using the 2017 London SHLAA as a starting point. As set out in para 4.1.2 of the ItP LP - *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.*

Your responses to the above questions are gratefully awaited.

Many thanks

Valerie



**Valerie Mowah**

Principal Spatial Planner  
020 8545 3053  
valerie.mowah@merton.gov.uk



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**From:**Darren Richards <[Darren.Richards@london.gov.uk](mailto:Darren.Richards@london.gov.uk)>

**Sent:**31 July 2020 13:44

**To:**Valerie Mowah <[Valerie.Mowah@merton.gov.uk](mailto:Valerie.Mowah@merton.gov.uk)>

**Cc:**Celeste Giusti <[Celeste.Giusti@london.gov.uk](mailto:Celeste.Giusti@london.gov.uk)>

**Subject:**RE: Queries - London Plan Housing Policies

Hello Valerie

I have cc'd Celeste, who now leads on housing policy. She is on leave this week, but back next week

Thanks

Darren

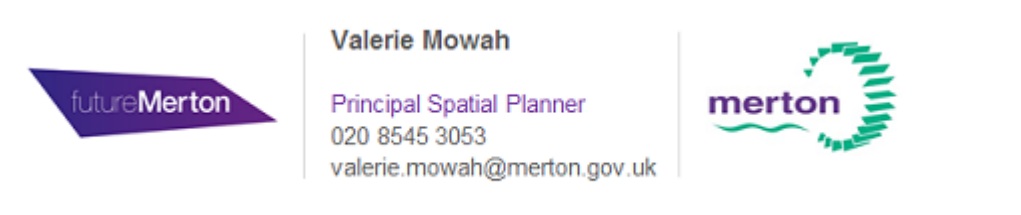
**From:**Valerie Mowah <[Valerie.Mowah@merton.gov.uk](mailto:Valerie.Mowah@merton.gov.uk)>  
**Sent:**31 July 2020 13:40  
**To:**Darren Richards <[Darren.Richards@london.gov.uk](mailto:Darren.Richards@london.gov.uk)>; Planning <[Planning@london.gov.uk](mailto:Planning@london.gov.uk)>  
**Subject:**Queries - London Plan Housing Policies

Hello Darren,

I have some London Plan housing policies related queries on which advice from the GLA is requested. Please can you advise who the relevant contact would be to put these queries to?

Many thanks

Valerie



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