

## CED025 – LBR response to Crest Nicholson

In relation to the note provided by Mr D Lampard of Crest Nicholson provided on 7/6/17 the Council's response is as follows:

With regards to Mr Lampard's first point, the Further Alterations to the London Plan (FALP) were adopted in March 2015. These alterations introduced table 3.1 into the London Plan in its current form which provides the "annual average housing supply monitoring targets 2015-2-25". The FALP sets the Council a new minimum housing target of 1,123 homes per year (compared to 760 new homes per year previously). Therefore, the first year that the Council should seek to meet this minimum requirement is considered to be monitoring year 2015/16. Therefore, figure 12 on page 39 of the submitted Local Plan, contains an error in showing that that the minimum target, derived from the London Plan, for 2014/2015 monitoring years to be 1,123 new homes. The correct target for 2014/15 monitoring year should be 760 new homes, with the target of 1,123 homes commencing in the monitoring year 2015/2016. A correction to Figure 12 will be added to the Council's schedule of proposed modifications.

Given the above, the recorded shortfall within the Local Plan, as stated in paragraph 3.8.9, should be 2,149<sup>1</sup> not 2,004 as stated in para. 3.8.9 of the submitted Local Plan (nor 2,512 as suggested by Mr Lampard). The Council will also correct para.3.8.9 within the schedule of modifications. No material issue is considered to arise from this correction since the Council accepts that a 20% buffer should be added to its housing target to reflect previous undersupply.

With regards to Mr Lampard's second, third and fourth points, the Council refers to the Strategic Housing Market Assessment (CED109), paragraphs 0.19 and table 1, paragraphs 7.18, 7.19 and table 18 (page 86). It is clear from these paragraphs that, notwithstanding the base year for the SHLAA being 2011 (or financial year 2011/2012), an adjustment was made for under-supply in the intervening years 2012/13 to 2014/15 (see in particular para.7.18 - 7.19). Therefore, the shortfall to which Mr Lampard's referred for the years 2013/14 and 2014/15 (namely the intervening years between the SHLAA base year and the adoption of FALP in 2015) has been addressed and accounted for in the setting of the Council's minimum housing target set out in table 3.1 of the London Plan (introduced by FALP), which provides expressly housing targets "2015-2025".

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<sup>1</sup> Total five year minimum housing requirement = 3,945 (905 + 760 + 760 + 760 + 760) minus total completions in five year period = 1, 796 (348 + 583 + 301 + 306 + 258) Total = 2,149.