

Submission 1: 1257997 Brian O’Leary

MATTER 2: VISION, STRATEGIC OBJECTIVES, SUSTAINABLE DEVELOPMENT AND THE SCALE OF GROWTH

Issue 1 - Whether the vision and strategic objectives have been positively prepared and are justified, effective, consistent with national policy, and in general conformity with the London Plan with regards to the achievement of sustainable development (Vision, Objectives, Policy 1)

Q29 *How has the scale of housing growth (27,000 additional homes) and employment floorspace (52,000 square metres) set out in Policy 2 been arrived at?*

- i. Has an appropriate methodology for assessing housing need and establishing the housing requirement been applied?*
- ii. Are the housing and employment requirements/targets positively prepared?*

No, the methodology is flawed as it is not taking account of possible changes in population trends

Q30 *Is the housing requirement in Policy 2 in general conformity with the London Plan?*

No the assessment of housing need and scale of housing growth is inconsistent with and not in general conformity with the London Plan and is therefore unsound.

In its own **Feb 2019 Strategic Housing Market Assessment (SHMA), 6.4-19 p98-110**, the Council argues in favour of GLA projections to that of the ONS. Even if the Council feels it needed to amend the London Plan’s targets by adding its own local information on the need for homes along maybe with the desirability of a buffer, it has not been open in this belief never mind willing to consult on it. Its amendment [**Policy 2 – scale of Growth**] of the London plan’s targets results in a **114% higher local target for the Borough than**

recommended by the London Plan, which is beyond credible.

The **unsoundness** is probably increased once consideration is given to the causality that is assumed to underlie the London Plan projections for population and the corresponding housing targets.

The **London SHMA 2017** 3.8 identified that ...” *London’s population growth was particularly rapid in the last decades*”. The reasons it gave were: strong economic growth, successive enlargement of the EU, 30% increase in numbers of births, continued fall in mortality and reductions in outward migration post ’08 financial crisis.

However, post-Brexit and with Covid, many of these influences have radically changed: free EU movement has ended, there has been net outward EU migration from London with net non-EU migration uncertain, there has been an increase in the net internal out-migration from London, the birth rate could have fallen, excess deaths have risen with Covid and average life expectancy has fallen as a result and, finally, with slower medium term growth expected internationally by many forecasters, London is unlikely to buck this trend.

The GLA **Demographic Update Sept 2021, 2020-based Population Projection Results**, assumes a short run fall in numbers before previous long run trends resume in 2022. However the degree of divergence between their high and low population variant by 2025 (fig 2) indicates significant future uncertainty.

Remedy to improve soundness:

The above suggests, until future trends become clearer, a need for caution even regarding London Plan's targets.

Meanwhile, surely the Council **should consider scaling back its housing ambitions**. Policy 2, 4.9 states that *"the evidence base was produced before the pandemic"*, and 4.10 states *"...long term forecasts as stated above may be susceptible to change....this would trigger a review of the Plan"*. Given the apparent demographic changes, beginning possibly as early as 2016, it is already **time for a Plan review**.