

HAMMERSMITH & FULHAM LOCAL PLAN EXAMINATION HOUSING

HO1 – Housing Supply

1. *Is Policy HO1 consistent with National Planning Policy Framework and aligned adequately with the London Plan?*

We refer to our representations. The Local Plan Regulation 19 consultation was supported by the SHMA 2014/15 report. The SHMA 2016 report only became available after the close of this consultation. Neither report provides an NPPF compliant assessment of housing need. It provides an up-to-date assessment of the components of the affordable housing need, and the needs of specific groups, but it does not provide an objectively assessed need, that considers the issues outlined in the NPPG, such as market signals, and employment needs, and lifting supply to facilitate the supply of more affordable homes. The Council depends on the London Plan housing benchmarks in Policy 3.3 for soundness.

The benchmarks in Policy 3.3, however, are only the starting point for the assessment of need. London Plan policy 3.3Da states that the Boroughs should draw upon these benchmarks, but augment these where possible, with extra supply to close the gap between London's strategic need (an OAN of 49,000) and supply in line with the requirement of the NPPF.

Policy 3.3G states that local authorities should “monitor capacity and *provision* against the average targets in Table 3.1, *local housing needs assessments...*”.

The Mayor's Housing SPG (March 2016) states in paragraph 1.1.8 clarifies that the need for local assessments “*echoes the requirements of the NPPF under which planning authorities must seek to meet the full, objectively assessed needs for market and affordable housing in the housing market area*”.

Paragraph 3.1.3 of the Housing SPG states that:

“The London Plan is clear that boroughs remain responsible for assessing their own requirements, within the policy context set by the NPPF and the London Plan.”

Moreover, paragraph 3.1.8 of the Housing SPG clarifies:

“The tiered approach to understanding housing requirements, with a strategic London wide study supplemented by more detailed sub regional and local studies, has been an accepted approach in the context of London's two tier planning system. This approach is designed to address the requirements of the NPPF and those of Policy 3.8. It also means borough can ensure that sub-regional and local studies take account of London boundary relationships as required by Policy 2.2 of the London Plan and the Duty to Cooperate...”

The SHMA does not meet with the requirements of the London Plan or national policy.

2. *Should the housing targets be referenced as minimums?*

Yes, because this would be in conformity with London Plan policy 3.3D. The benchmark figures provided in Table 3.1 of the London Plan are minimum figures. Increasing supply above the benchmarks is one of the actions necessary to close the gap between the strategic identified need for 49,000 homes a year and London's identified capacity for only 42,000 homes a year. Supporting paragraph 3.19i refers to the benchmarks as minimum targets.

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