

**London Borough of Southwark Response**  
**Examination of the New Southwark Plan**  
**Inspectors' Matters, Issues and Questions**

**Matter 6 – Housing Land Supply**

Issue 1

Is the level of housing required deliverable in years 1-5 (2020/21-2024/5) and developable in years 6-15 (2025/6-2035/6)?

***Housing Supply and Delivery***

**Question 6.1**

**Since the base date of the Plan at 1 April 2018, how many dwellings have been built in Southwark to 31 March 2020? Is that a net figure, allowing for demolitions and loss of stock?**

1. The Housing Background Paper (SP101) sets out the gross and net annual completions (table 4) and approvals (table 3) from 2004 –2019. The table below highlights the net completions figure for the financial year 2018-2020 (April 1<sup>st</sup> 2018 – March 31<sup>st</sup> 2020) of 5,204 homes. This is a net figure which accounts for demolitions and loss of stock. The [Authority Monitoring Report, Housing Facts and Figures](#) provides a detailed breakdown of the historic completions and approval of housing in the borough.

## Net Completions Table

Financial Year (1 Apr - 31 Mar)	Housing Total	Market Total	Affordable Housing			
			Affordable Housing total	Social Rent	Affordable Rent	Other Intermediate
2004 - 2005	1227	1066	161	50	NA	111
2005 - 2006	1394	1116	278	69	NA	209
2006 - 2007	1958	1223	735	330	NA	405
2007 - 2008	1249	713	536	63	NA	473
2008 - 2009	1041	742	299	159	NA	140
2009 - 2010	1333	633	700	421	NA	279
2010 - 2011	1391	832	559	146	NA	413
2011 - 2012	1084	491	593	459	NA	134
2012 - 2013	1065	577	488	326	NA	162
2013 - 2014	1669	1186	483	299	24	160
2014 - 2015	1216	1107	109	-121	61	169
2015 - 2016	1390	1277	113	-166	132	147
2016 - 2017	2432	1880	552	371	22	159
2017 - 2018	859	675	184	90	15	79
2018 - 2019	3208	2582	626	190	45	391
2019 - 2020	1996	1427	569	134	168	267
<b>Total</b>	<b>24512</b>	<b>17527</b>	<b>6985</b>	<b>2820</b>	<b>467</b>	<b>3698</b>
<b>Annual Average</b>	<b>1532</b>	<b>1095</b>	<b>437</b>	<b>176</b>	<b>29</b>	<b>231</b>
<b>Percentage</b>	<b>100%</b>	<b>72%</b>	<b>28%</b>	<b>12%</b>	<b>2%</b>	<b>15%</b>

2. The Housing Delivery Test Action Plan results for 2020 were published by Ministry of Housing, Community and Local Government (MHCLG) in January 2021 and indicate that Southwark has a delivery of 72% of homes against our housing target, 5,332 homes out of the required 7,403 homes. As our completion figure is below 75% this requires a 20% buffer to be added to our housing supply. The Inspectors have acknowledged these results in their letter New Southwark Plan - Housing Delivery Test Results 2020, dated 25 January 2021 (EIP52).
3. In the previous two years our completion figures have been 80% in 17/18 and 93% in 2018/19.
4. The Leader of Southwark Council has written to the Secretary of State (letter provided as EIP195) raising concerns over the Housing Delivery Test result due to the accuracy of the data provided to MHCLG by the Greater London Authority (GLA). The Housing Delivery Test records Southwark's 2019/2020 completions as being 1,299 net units. Southwark Council had been unable to verify this figure before the publication of the HDT. Southwark has since been working with the GLA to ensure the accuracy of these figures and have agreed with the GLA that the net completion figure for 2019/2020 was 1,909 homes. This would mean that Southwark's delivery would reach 80%.

5. We are also required to prepare a Housing Delivery Test Action Plan as our delivery was below 95%. A Housing Delivery Test Action Plan was prepared and agreed by Cabinet on the 17th September, 2019. The Action Plan provides an overview of housing delivery within the borough, setting out various programmes and initiatives that are currently undertaken to boost the delivery of new homes. The Action Plan also sets out where there are delivery issues in the borough and how these can potentially be overcome. The Action Plan will be updated and will include an update on the how the council is performing against the actions.

## **Question 6.2**

### **What is the estimated total supply of new housing over the plan period?**

1. Given the significant need for housing in Southwark the delivery of new homes is one of our strategic priorities. We are committed to delivering as many new homes as possible, including social rented and intermediate homes to meet our acute need as demonstrated above in the Table showing net completions since 2004. These homes should be of high quality and provide security for our residents to ensure they can feel safe in their homes.
2. The delivery of new homes needs to be balanced with the delivery of other land uses to achieve sustainable development, including employment, education, health and community uses and open space. The site allocations therefore set out the required land uses for development coming forward on the sites to ensure we can achieve our development needs for Southwark.
3. The main development needs are for housing and employment space (including town centre uses) and the NSP must balance the delivery of both. We must make land available to house a growing population, encourage economic growth, enhance Southwark's town centres and London's Central Activities Zone (CAZ) and ensure that adequate infrastructure is provided. The NSP must also ensure that development is sustainable and makes effective use of previously developed land.
4. Our housing policies seek to meet our housing need, through encouraging housing supply and requiring it on site allocations in appropriate locations.
5. The London Plan (2021) 10 year target for Southwark is 23,550 net additional homes as set out in the New Southwark Plan which is based on strategic need and capacity in London as a whole. This equate to 2,355 homes per annum.

6. As set out in the Strategic Targets Background Paper (EIP161) the plan period for the Plan will be updated. It has been agreed to update this to 2019-2036 and the housing target in Policy SP1 will be updated to reflect this. It is also proposed to reinforce our support for delivery of homes on small sites within Policy SP1 as set out in the Strategic Targets Background Paper (EIP161).
7. Policy SP1 in the Plan (EIP27A) sets out how we will meet our housing need and achieve our affordable housing target of 50% through:
  - Meeting and exceeding our housing target of 35,325 homes between 2020-2035;
  - Building 11,000 new council homes by 2043 as part of our overall housing target, by developing our own land and developing on some of our existing estates, including in-fill development;
  - Encouraging developers to increase the provision of social rented and intermediate homes on sites beyond 35% (set in Policy P1);
  - Encouraging developers to receive affordable housing grant to increase the provision of social rented and intermediate housing;
  - Encouraging developers to provide more social rented and intermediate housing through the fast track route.
8. Southwark Council is the largest social landlord in the capital, a legacy we continue to build upon year-on-year. The Housing Strategy (EIP156, Principle 1) sets out how we will achieve our ambitious target of 11,000 council homes by 2043. There is a comprehensive programme in place to achieve this target, starting with the delivery or start on site of 2,500 homes by 2022 which is on track to be achieved. We have a programme in place to meet this target, which includes a new homes delivery team, a dedicated planning team and a new homes transformation board. We are already building new homes with 1,167 delivered or under construction and a further 1,247 homes are expected to start on site in 2021/22. A number of these schemes are either subject of a planning application or have obtained planning permission.
9. As set out in the Housing Background Paper (SP101) Paragraph 5.42 our social rented and intermediate housing requirement is 35% on developments providing housing (with the exception of Aylesbury Action Area). Our housing target is 50% affordable housing. Some of 15% shortfall between our housing target and requirement will be met through our new council homes delivery programme.
10. The delivery of social rented and intermediate homes is one of our strategic priorities. Our fast track route seeks to maximise the provision of affordable housing. It provides an incentive for developers to push up their social rented and intermediate housing provision as they can fast track their application.

11. Our housing supply figures need to be considered by looking at the site allocations in the plan and the capacity of homes they 'must' or 'should' deliver. In addition to site allocations, there is a supply of homes coming forward through planning permissions that are being implemented, area action plan site allocations that have permissions and windfall sites that will come forward through the consideration of development management policies.
12. The Plan includes an area vision for Aylesbury, and the Area Action Plan site allocations are identified in the vision map – as a factual update to the Plan, the AAP1, AAP2, AAP3 and AAP4 site allocations should be inserted into the Plan to provide further guidance on any developments coming forward on the sites (as set out in the Aylesbury Background Paper EIP202).
13. As set out above the New Southwark Plan period will be amended to 2019-2036 to ensure there is a 15 year plan period following the adoption of the plan in line with Paragraph 22 of the NPPF. This covers a 17 year period and with the London Plan 2021 housing target rolled over the 17 year period requires the delivery of 37,680 homes.
14. The housing land supply period has been updated to cover 2020-2035. The 5 and 15 Year Housing Land Supply Report Update (April 2021) (EIP198) sets out our housing delivery from 2019-2020, the 5 year housing supply from 2020-2025, the 6-15 year supply from 2025-2035. The completion figures are included for 2019-2020 to align with the London Plan 2021 which has a plan period starting from 2019 and delivery can be assessed against the target going forward.
15. The Site Allocations Methodology Report Update (April 2021) (EIP82A) has also been updated to reflect this. The Housing Trajectory on Page 31 of Plan (EIP27A) will be updated to reflect the updated supply and timeframes for delivery which are being undertaken.
16. The 5 and 15 Year Housing Land Supply Report confirms that London Borough of Southwark has sufficient housing land to meet its five year housing target for the period from 1 April 2020 to 31 March 2025 and for the following 10 years (2025-2035) as required by the National Planning Policy Framework. The report confirms that there are 14,765 expected to come forward in the first five years and 35,091 number of homes expected to come forward in year 6-15.
17. An updated monitoring framework (EIP176) has been prepared to set out clearly what will be monitored online through the delivery of the Plan including housing and affordable housing delivery.

### Question 6.3

**What is the estimated supply from each source (allocations, permissions as of 1 April 2020, windfall) for the plan period? What is the evidence to support this and are the estimates justified?**

1. Our strategy for delivering homes, including social rented and intermediate homes is set out under LBS response to Q6.2.
2. The estimated supply from each source and the justification for this is set out in the updated 5 and 15 Year Housing Land Supply (April 2021) (EIP198) and the updated Site Allocations Methodology Paper (April 2021) (EIP82A). It is also summarised in the tables below.

**Five year housing land supply (2020-2025) (A+B+C= D) :**

Reference	Housing supply source	Deliverable capacity
A	Sites identified in planning documents, and sites with extant planning permissions and live planning applications	10,003
B	Approved planning permissions in the pipeline	3,062
C	New Council Homes Delivery Programme	1,700
D	<b>Total</b>	<b>14,765</b>
	Five year housing target and buffer Southwark (1 April 2020 – 31 March 2025)	14,130
	<b>Units above requirement</b>	<b>635</b>

**Six to fifteen year housing land supply (2025-2035) (A+B+C= D):**

Reference	Housing supply source	Developable capacity
A	Sites identified in planning documents with or without permission	28,671
B	New Council Homes Delivery Programme	590
C	Windfall allowance for small sites (determined through historic delivery of small sites)	5,830
D	<b>Total</b>	<b>35,091</b>
	Six to fifteen year housing target Southwark (1 April 2025– 31 March 2035)	23,550
	<b>Units above requirement</b>	<b>11,541</b>
	2035-2036 – to cover full plan period	There is sufficient capacity to carry delivery forward to 2036 if some of the site allocations are not delivered up to 2035.

#### **Question 6.4**

**What is the housing requirement for the first five years following adoption of the plan and what buffer should be applied?**

1. Our strategy for delivering homes including social rented and intermediate homes is set out under LBS response to Q6.2.
2. The London Plan (2021) 10 year target for Southwark is 23,550 net additional homes as set out in the New Southwark Plan which is based on strategic need and capacity in London as a whole.
3. The five year housing supply requirement for Southwark in the London Plan is 2,355 homes per year, which equates to 11,775 homes over the five year period.
4. Due to an undersupply of homes over the previous three years, a 20% buffer has to be added to the five year target brought forward from later in the plan period as required by the National Planning Policy Framework. With the 20% buffer, Southwark's 5 year housing requirement is 14,130 homes.
5. This is set out in detail in the 5 and 15 Housing Land Supply Report Update (EIP198).

#### **Question 6.5**

**Having regard to Planning Practice Guidance paragraph 68-007-20190722 what is the estimated total supply of specific deliverable sites for this period? What is the estimated supply from each source for this?**

1. Our strategy for delivering homes including social rented and intermediate homes is set out under LBS response to Q6.2.
2. Planning Practice Guidance paragraph 68-007-20190722 sets out what the 5 year land supply is - a supply of specific deliverable sites sufficient to provide 5 years' worth of housing (and appropriate buffer) against a housing requirement set out in adopted strategic policies, or against a local housing need figure, using the standard method, as appropriate in accordance with paragraph 73 of the National Planning Policy Framework.
3. The 5 and 15 Year Housing Land Supply Report Update (EIP198) confirms that London Borough of Southwark has sufficient housing land to meet its five year housing target through deliverable sites for the period from 1 April 2020 to 31

March 2025, the supply of homes and sources is set out in LBS response to Question 6.3 above. Further information on the sources is set out in EIP198.

4. The Housing Trajectory on Page 31 of Plan (EIP27A) will also be updated to reflect the updated supply and timeframes for delivery which are being undertaken. The Housing Trajectory will set out the housing supply by each financial year.

## **Question 6.6**

**What is the estimated total supply of developable sites for years 6-10 and 11-15? What is the estimated supply from each source for this (including windfalls)?**

1. Our strategy for delivering homes including social rented and intermediate homes is set out under LBS response to Q6.2.
2. The 5 and 15 Year Housing Land Supply Report Update (EIP198) confirms that London Borough of Southwark has sufficient housing land to meet its 6-15 year housing requirement through developable sites for the period from 1 April 2025 to 31 March 2035, the supply of homes and sources are set out in LBS response to Question 6.3 above. Further information on the sources is set out in EIP198.
3. The Housing Trajectory on Page 31 of Plan (EIP27A) will also be updated to reflect the updated supply and timeframes for delivery which are being undertaken. The Housing Trajectory will set out the housing supply by each financial year.

## **Question 6.7**

**What is the compelling evidence to support the windfall allowance? Is this consistent or comparable with the 'small sites' figure for Southwark identified in the Intend to Publish London Plan 2019?**

### **LBS Response**

1. Our strategy for delivering homes, including social rented and intermediate homes is set out under LBS response to Q6.2.
2. See our full response to this question in the Strategic Targets Background Paper (EIP161). The 5 and 15 Year Housing Land Supply Report Update (EIP198) also provides justification for the windfall allowance within the 6-15 year housing land supply.



## **Question 6.8**

**Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare?**

1. Our strategy for delivering homes, including social rented and intermediate homes is set out under LBS response to Q6.2.
2. See our full response to this question in the Strategic Targets Background Paper (EIP161). The Site Allocations Methodology Report Update (EIP82A) sets out figures for capacity of homes on site allocations, this includes amendments to the capacities on a couple of sites due to planning permission being granted or an agreed amendment to the capacity with the landowner (NSP17, NSP24, NSP34), however, these do not materially affect the conclusions in the Strategic Background Paper in relation to the delivery of homes on site no larger than 1ha.