

Royal Borough of Kensington and Chelsea Local Plan Partial Review Examination

Comments by the Kensington Society on the Council's supplementary statement on the 5-year housing land supply in the LPPR (EX024)

RBKC Five-Year Housing Land Supply and Housing Trajectory

The Kensington Society strongly supports the Royal Borough's supplementary statement on the 5-year housing land supply in the Local Plan Partial Review.

RBKC's London Plan Housing Target

At the Examination the Society stressed that in London housing targets, although informed by assessments of objectively-assessed need, are ultimately determined by housing targets which reflect capacity derived from the London-wide SHLAA after apportioning the London-wide target between London Boroughs in relation to their capacity. These targets are expressed in the London Plan as average annual figures based on a 10-year target for London and for each London Borough.

As a context for the current LPPR, it should be noted that despite a significant uplift in the London-wide target in the draft London Plan 2017 from 42,389pa to 64,935pa, the revised target for Kensington and Chelsea has been reduced from 755pa to 488pa. In the 2016 London Plan, nine London Boroughs had lower targets than RBKC. In the latest draft London Plan RBKC has the second lowest target – only the City of London has a lower target.

The latest London Plan target reflects:

- greater realism about both revised assessments of the capacity of sites
- reduced assumptions about vacant stock coming back into use;
- a change in approach to small sites/windfalls;
- changes in the phasing of delivery from large sites; but, above all
- the abandonment of the estate renewal projects.

This effectively means that the 2016 target of 733 net additional units per year has already been heavily discounted in terms of the GLA's expectations of housing delivery even before the new target has been through examination. The GLA signed off the LPPR, including specifically the housing numbers, as being in general conformity with the London Plan.

What status should the draft London Plan housing target for Kensington and Chelsea have?

Normally, it would be appropriate to say that it would have limited weight. However, in the special circumstances of Kensington and Chelsea – the highly constrained capacity, but, particularly, the abandonment of estate renewal projects following the Grenfell Tower tragedy – the likelihood of any increase in the final target is remote. This is because in successive London Plans there have been few examples of London Plan targets changing as a result of the Examination (usually in a downward

direction) and no one is likely to object to this proposed reduction, especially in the wake of Grenfell.

As a result the new London Plan target, which was agreed post-Grenfell, already reflects scaled-back expectations between 2017 and the adoption of the new London Plan in 2019. It would, therefore, be unrealistic and perhaps unreasonable to apply the London Plan 2016 target as the basis for the housing delivery trajectory.

London Plan Housing Targets for Kensington and Chelsea: 2004-2018

| | Annual Target | 10-year period | Operated |
|------------------------|---------------|----------------|-----------|
| London Plan 2004 | 540 | 1997-2016 | 2004-2016 |
| London Plan 2008 | 350 | 2007-2017 | 2008-2011 |
| London Plan 2011 | 585 | 2011-2021 | 2011-2016 |
| London Plan 2016 | 733 | 2015-2025 | 2016-2019 |
| Draft London Plan 2017 | 488 | 2019-2029 | 2019- |

Targets v OAN

Unlike the rest of the country, London's housing target is determined by capacity. The objectively-assessed need (OAN) of individual boroughs is part of London's overall need, but the relationship between OAN at the borough level and the borough target reflects its capacity. In effect, it is a negotiated distribution based on each borough's capacity. The latest - draft London Plan – allocation/target already takes this revised redistribution into account. Any assessment of the 5-year land supply needs to reflect the borough's revised housing target, rather than the pre-Grenfell situation. This was confirmed by the GLA's recognition that the LPPR is in general conformity with the London Plan – which recognises the housing supply needs to reflect the reality of a reduced capacity due to the removal of estate regeneration projects. The borough's share of OAN is absorbed in the new increased targets for Outer London boroughs.

Summary

The Society considers that the housing land supply and housing trajectory proposed by the Council is sound and reflects the current reality. The draft London Plan makes clear how the new forecast of OAN for London relates to the capacity of individual London boroughs to accommodate London's growth. The 2016 London Plan figures have been overtaken by revised forecasts of OAN (GLA SHMA) and of capacity (GLA SHLAA) – and have "absorbed" the post-Grenfell changes in RBKC in apportioning the London-wide target between boroughs according to capacity. It would be unrealistic to saddle the revised Local Plan with a delivery requirement that relates to an out-of-date target. We support the Council's statement.

Michael Bach
Kensington Society
25 April 2018