

Cllr Kieron Williams
Leader of the Council

Ministry of Housing, Communities
and Local Government
2 Marsham Street
London
SW1P 4DF

Cabinet Office
Southwark Council
P.O Box 64529
London
SE1P 5LX

kieron.williams@southwark.gov.uk

31 March 2021
Ref: KW-35

Dear Mr Jenrick,

RE: Housing Delivery Test 2020

On January 19th 2021, the government published the Housing Delivery Test: 2020 measurement. The Ministry of Housing, Communities and Local Government (MHCLG) introduced the Housing Delivery Test (HDT) in November, 2018 as a mechanism to monitor housing delivery locally.

Southwark is committed to providing homes of all tenures. Southwark has some of the highest rates of affordable homes delivery in London and the country, and we remain committed to building 11,000 new council homes despite the post-COVID-19 economy. Southwark has one of the best track records of housing delivery and has consistently consented more homes than most other councils. According to MHCLG's 2020 data, Southwark has the 4th highest number of homes required in England and has delivered the 22nd highest number of homes of the 328 local authorities on the Housing Delivery Test 2020 list. This is reflected through previous Housing Delivery Tests where in 2018 Southwark had a measurement of 80% and last year this improved to a measurement of 93%.

Under the 2020 measurement, Southwark has a result of 72% when measuring housing targets against delivery over the last three years and is now expected to apply the 'presumption in favour of sustainable development' as set out in paragraph 11 of National Planning Policy Framework 2019. At Southwark Council we will use every tool at our disposal to respond to the housing crisis, but we have concerns about accuracy of the 2020 measurement and the implications of applying the 'presumption principle'.

Firstly, the data provided by MHCLG suggests that Southwark has delivered 1,299 net homes in 2019/2020. However, 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%.

Secondly, the HDT calculates the 'homes required' figure based on an adopted target. On 29 January 2021 the Secretary of State wrote to the Mayor confirming that he is content for the Mayor's Publication London Plan (2020) to be formally published, with no further changes. The London Plan was adopted in March 2021.

The Mayor sets out a ten year target in the London Plan to take into account the fact that larger schemes may take several years to be fully built out, for example, the schemes in the Old Kent Road Opportunity Area. Southwark's ten year target as per the London Plan is 23,355 new homes, giving an average annual figure of 2,335. This is the figure that informs Southwark's Five and Fifteen Year Housing Land Supply with the required 20% buffer as per the NPPF requirements.

The London Plan target alongside the New Southwark Plan, which is also at an advanced stage, should therefore be considered as the housing target for Southwark instead of the adopted London Plan target that appears to have been used to calculate the 'housing required' figure for 2019/2020.

Thirdly, Southwark has consistently approved a large number of new homes. Between 2015 – 2020, Southwark approved a net additional 8,200 new homes. The fact that some consents are not being implemented is outside the control of the authority. This reflects the government's lack of support for affordable housing through its grant programme. Southwark Council would encourage the government to work with local authorities to ensure the delivery of new homes. For example, if the government confirmed funding for much needed transport infrastructure like the Bakerloo Line Extension it is likely delivery would pick up.

Where the council is in control of delivery, through the New Homes Delivery Programme, a significant number of homes have been built or are currently under construction and the council is well on target to deliver 11,000 new homes by 2043.

In the current housing crisis meeting, the significant need of affordable housing from the most vulnerable in society is our priority. The council must follow the Public Sector Equality Duty to ensure equality for all and maximise the delivery of affordable housing to reduce the direct impact on different equalities groups mirroring the impact COVID-19 has had on certain groups.

The council would encourage the government to work with local authorities to ensure the delivery of new homes, particularly where authorities are consistently approving a high number of new homes every year.

Yours Sincerely,



Cllr Kieron Williams
Leader of the Council