

GREATER LONDON AUTHORITY

Rt Hon Sajid Javid MP
Secretary of State for Communities and Local Government
2 Marsham Street
London
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Date: 9 November 2017

Dear Sajid

Response to DCLG consultation on planning for the right homes in the right places

We write on behalf of the Mayor of London, Sadiq Khan, to respond to the Government's consultation on 'Planning for the right homes in the right places'. Our detailed response to each of the questions, of relevance to planning in London, is enclosed.

The Mayor is committed to tackling the housing crisis, and will be publishing the new London Plan shortly. This will identify that London needs to build 66,000 new homes a year between 2016 and 2041. This figure is based on the GLA's own projections methodology which has underpinned every London Plan and been found sound at every Examination in Public. Whilst the need figure differs from the DCLG's figures, the GLA is confident that it is robust and based on best practice. We note that much of the difference between DCLG's figure of 72,000 and our own estimate of 66,000 is down to the longer time period used for the latter.

We are concerned at the proposals for Statements of Common Ground to be applied to Mayors with plan-making powers. This appears to misunderstand the statutory process for adopting the London Plan, and could result in the opposite effect to that which is intended. The Mayor is committed to meeting London's housing needs within London. The proposals, if applied to London, would add delay to getting plans in place, and hinder attempts to utilise all sources of development capacity.

We agree that affordable housing requirements to be delivered by developments should be set out in Local Plans. Plan viability testing should be a high-level assessment to ensure that the aspirations of the plan are realistic and reasonable. In line with current policy, this should be proportionate, using appropriate available evidence. We also strongly support the approach that where planning requirements have been tested as part of the plan process this should not normally require retesting at planning application stage. We suggest that specific issues that should be considered when reviewing national guidance on viability include the use of current day values/ forecasts, land value and viability review mechanisms.

Finally, we are concerned that the proposed delivery test set out in the White Paper does not reflect the different circumstances of London and will not deliver more homes. We would welcome the opportunity to agree a bespoke housing delivery test for London based on the Mayor's statutory role in implementing the London Plan.

Yours Sincerely,



Jules Pipe
Deputy Mayor for Planning, Regeneration and Skills



James Murray
Deputy Mayor for Housing and Residential Development

Mayor of London's response to Planning for the right homes in the right places

Proposed approach to calculating local housing need

Question 1:

- a) do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?
- b) how can information on local housing need be made more transparent?

1. The Mayor supports a rigorous and transparent approach to the assessment of housing needs, particularly in London where both affordability and available land are uniquely constrained.
2. The Mayor has been clear that London should meet its own housing needs in full without building on the Green Belt. As a result, the best use must be made of potential housing capacity in every London borough. The Mayor's forthcoming draft new London Plan, due to be published 29 November for consultation, will therefore identify the housing needs of London as a whole and set challenging local housing provision targets based on a uniquely rigorous and exhaustive analysis of housing capacity jointly carried out earlier in 2017 by the GLA and London boroughs.
3. We welcome the recognition in the consultation paper (subsequently affirmed in discussions with DCLG officers) of the role of the Mayor's London Plan in distributing total housing need across the London housing market area, ensuring that growth is focused on the most sustainable locations and is not constrained by estimated local need in areas of higher capacity.
4. The housing need requirements in the draft new London Plan are based on a London-wide Strategic Housing Market Assessment (SHMA) carried out to an established method and using the GLA's in-house demographic projections. They will be submitted for inspection well ahead of the April 2018 deadline proposed in the consultation paper. The new SHMA, based on a detailed analysis of demographic projections, backlog need and affordability, concludes that London has an annual need for 66,000 new homes a year between 2016 and 2041.
5. The GLA has been using its own in-house demographic projections since its inception. They have been recognised by independent Inspectors as a robust evidence basis for successive iterations of the London Plan. More recently, the GLA's projection methodology has been reviewed by the Centre for Population Change in a public report¹. They gave a positive assessment that validated the GLA's approach. The report provided reassurance to authorities in the wider South East outside London, as the projections can generate consistent outputs for each district in England.

¹ <https://data.london.gov.uk/dataset/projection-methodology-independent-review>

6. The GLA projections are based on a longer series (ten-years) of past migration data than official projections, which is widely considered to be best practice for strategic planning. They form part of a wider body of projections and assessments carried out by the GLA that contain a level of detail not available in official outputs, and used for a range of planning and policy purposes by the boroughs, TfL and utilities.
7. We note that much of the difference between DCLG's formulaic figure of 72,000 and our own estimate of 66,000 is down to the longer time period used for the latter, as both DCLG and the GLA project that the rate of household growth will be lower towards the end of this period. By our calculations, extending the DCLG formulaic method out to 2039 (the last year of DCLG household projections, and the closest to the GLA's target year of 2041) would result in a London-wide total of 68,445, much closer to the estimate from the London SHMA.
8. It is also worth noting that in London the capping element of the formula should use the housing provision targets set out in the 2015 London Plan, which we estimate would result in a London-wide total of 56,957. This is because the London Plan is part of every borough's development plan, and therefore all London boroughs have an up to date housing target. As a result, the 40% cap would apply to the uplift on the current London Plan housing target of 42,000 new homes a year.

Question 6: do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?

9. The proposed transitional arrangements should recognise the different procedures that apply to Spatial Development Strategies prepared by Mayors with plan-making powers. The Mayor considers that, by publishing the draft London Plan for consultation and formally commencing the Examination in Public process before the March deadline, the transitional arrangement has been met.

Statement of common ground

Question 7:

- a) do you agree with the proposed administrative arrangements for preparing the statement of common ground?
- b) how do you consider a statement of common ground should be implemented in areas where there is a Mayor with strategic plan-making powers?
- c) do you consider there to be a role for directly elected Mayors without strategic plan-making powers, in the production of a statement of common ground?

10. The Mayor does not support the proposal that Statements of Common Ground are introduced in areas where the Mayor has strategic plan-making powers. The Duty to Cooperate was introduced to compensate for the abolition of Regional Spatial Strategies in

England outside London. The proposal appears to misunderstand the very different circumstances of the statutory strategic planning system that continues to operate in London.

11. The three problems identified with the operation of the duty to cooperate are not relevant to London. Taking each in turn: the London Plan provides the means to plan strategic cross-boundary matters; London is a single housing market area and the Mayor clearly sets out the level of need that will be met; and the Mayor is prepared to take difficult decisions on meeting housing need as evidenced by the new London Plan.
12. It is not clear what purpose a statement would serve in London. The London Plan sets out both the housing need and supply for the strategic market area. The Mayor works closely with the boroughs to produce the Strategic Housing Land Availability Assessment (SHLAA), and seeks to optimise capacity. The Plan is subject to statutory procedures that go beyond both the Duty to Cooperate and these proposals for a Statement of Common Ground. The Plan goes through extensive public consultation and a formal Examination in Public by an independent Inspector. The requirement for a statement would add an unnecessary burden on the Mayor and boroughs, could delay production of the Plan, and might hinder the Mayor's objective to utilise all sources of housing capacity.
13. If the purpose is to agree a statement with authorities *outside* the GLA boundary, complementing the Duty to Cooperate, then this would go beyond the stated purpose, i.e. to cover a single housing market area. However, the Mayor has already established (bottom-up) strategic complementary collaboration arrangements to the Duty to Cooperate at member and officer level that are tailored to the Wider South East and address strategic matters². He also discharges his Duty to Co-operate constructively when responding to Local Plans outside London and explores strategic bilateral opportunities for collaboration. Where appropriate, he will support Memoranda of Understanding to formalise partnership agreements / commitments between relevant authorities. In terms of the preparation of the London Plan, the Mayor has statutory duties to inform and consult. He takes these very seriously.
14. The Mayor also supports those authorities in the Wider South East who are working together as single housing market areas to prepare shared evidence and shared strategic priorities. The Mayor agrees that the Statement of Common Ground would be helpful in areas where the Duty to Cooperate has not been operating effectively and as a result identified housing needs are not being planned for.

² <https://www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east>

Proposed approach to viability assessment

Question 12: do you agree that local plans should identify the infrastructure and affordable housing needed, how these will be funded and the contributions developers will be expected to make?

15. The Mayor agrees that plans should identify the infrastructure required to deliver the plan and affordable housing need. This should be a high-level assessment which considers the type of infrastructure and significant projects that are required to facilitate development. It may not, however, be possible to identify exactly what specific measures will be required to address the cumulative impacts of development over the lifetime of the plan.

16. The level of funding required and funding sources should be identified, however funding plans often operate on different timescales to Development Plans. There is often uncertainty regarding the availability of funding at the plan-making stage through the plan period and there may be a significant funding gap which is dependent on the availability of public sector funding. The guidance should recognise that the review of funding requirements and sources is unlikely to be comprehensive and should be based on available information at the time of plan-making.

17. Affordable housing requirements to be delivered by development should be set out in Local Plans. National policy should encourage infrastructure charges to be developed alongside local plans. However, local authorities may not have the resources to undertake this simultaneously and there are clear benefits to being able to develop this outside of the local plan process. This may be necessary to respond to infrastructure requirements or market conditions as they evolve within the lifetime of the plan. The option to develop or update infrastructure charges outside of the plan process should therefore be retained.

Question 13: in reviewing guidance on testing plans and policies for viability, what amendments could be made to improve current practice?

18. Plan viability testing should be a high-level assessment to ensure that the aspirations of the plan are realistic and reasonable. However, as noted above, the full details of financial considerations including infrastructure requirements and funding sources for the full plan period are unlikely to be known at the plan making stage. This test should not be overly restrictive or inhibit the ability of authorities to plan for required levels of housing and employment growth and the associated infrastructure and affordable housing required to ensure that the development of an area is sustainable. It is therefore important that plan viability testing is proportionate, to enable authorities to plan fully for the needs of an area, and that it considers the resource constraints of local authorities.

19. The test should be based on typical circumstances, assessing typologies which reflect likely development scenarios. This enables the plan to set clear requirements that should apply in the majority of circumstances. It should be recognised that it is not possible to assess every

development circumstance which will vary by use, scale, location, site conditions, density, costs and values etc. Similarly, it is not possible to determine the level of exceptional costs or unique site constraints that may apply in different scenarios, nor is it appropriate to assume the existence of these in generic site testing as by their nature these circumstances will not apply in the majority of circumstances. The relationship between plan and site-specific viability testing is considered further below.

20. The requirement in PPG that values and costs should be determined on a current-day basis for the first five years of the plan may result in unrealistic testing outcomes, particularly for longer term phased developments. Where market forecasts from recognised sources for values and costs are available, planning authorities should be able to rely on these for testing within the first five years alongside testing on a current day basis for developments with a shorter programme that may come forward at the beginning of the plan period.
21. The approach to land value in PPG should be amended so that benchmark land values are informed by existing use values in line with Mayor's and the Harman guidance. Existing use value (EUV) has always formed the basis of determining benchmark land values in Mayoral Guidance and the GLA development appraisal toolkit guidance notes. The benefit of this approach is that it clearly identifies the uplift in value arising from the grant of planning permission and enables a comparison with the value of the site without planning permission. A premium can be added as an incentive for release of the site where necessary, which will depend on the circumstances of the site.
22. Whilst there have been instances where EUVs have been exaggerated within viability appraisals in order to inflate the benchmark land value, the use of a market value approach as set out in RICS guidance has proved to be more problematic at the plan and site-specific level. The reasons for this are set out in the Mayor's Affordable Housing and Viability SPG (see 3.48 onwards) and in a range of high profile reports³ and appeal decisions. In summary: market value may not fully reflect policy requirements regarding planning obligations or CIL; it may make unrealistic assumptions regarding the type and form of development that will be acceptable in planning terms; and it may be based on projections of future values, lower build costs and lower profit assumptions which are inconsistent with other assumptions within the plan viability assessment. As a result, site value is inflated which introduces an element of circularity and makes it almost inevitable that planning requirements will be found to be unviable.
23. References to market transactions and the market norm should be removed from PPG. The use of existing use value as a benchmark land value is considered further below.

Question 14: do you agree that where policy requirements have been tested for their viability, the issue should not usually need to be tested again at the planning application stage?

³ House of Commons CLG Select Committee, House of Lords Committee on the Built Environment, London Housing Commission, London Assembly Planning Committee, Joseph Rowntree Foundation etc.

24. The Mayor strongly supports the approach that where planning requirements have been tested as part of the plan process this should not normally require retesting at planning application stage.
25. Applicants should take account of all relevant Development Plan policies when forming their proposals and when acquiring land. Land owners should also take account of these requirements when applying for planning permission or selling sites.
26. The assessment of viability on a site-by-site basis has caused uncertainty, increased land prices and undermined the delivery of plan objectives. There are inherent difficulties in the assessment of viability at the application stage given uncertainty over inputs and the sensitivity of viability appraisals to small changes in assumptions. There is also a risk that site-specific viability testing is used as a device to reduce planning requirements and enhance commercial returns, even where genuine barriers to delivery do not exist.
27. To avoid these issues, testing of viability of a specific scheme should only be necessary where there are clear barriers to delivery. This will speed up the planning process and increase certainty for applicants and planning authorities, whilst supporting the implementation of planning policies and the delivery of sustainable development.
28. In setting Local Plan policies and associated guidance, if a planning authority considers that there are exceptional circumstances which it has not been possible to test through the plan viability assessment, it may be appropriate to set out the type of circumstances where they consider that it would be appropriate to consider viability on a site-specific basis.
29. These may include circumstances where an applicant is required to provide significant infrastructure improvements to facilitate delivery of a development (beyond the level that would typically be required for the scale of development) or where the value generated by a development would be exceptionally low.
30. If an applicant wishes to make the case that viability should be considered on a site-specific basis they should inform the local planning authority, prior to submission of the application. Evidence should be provided of the specific issues that would prevent delivery in line with relevant policies and guidance. The application should be determined in accordance with the Development Plan, with the decision-maker determining the weight to be given to viability alongside other relevant material considerations.

Question 15:

how can Government ensure that infrastructure providers, including housing associations, are engaged throughout the process, including in circumstances where a viability assessment may be required?

31. The Mayor supports the approach in which infrastructure providers and registered providers of affordable housing are engaged through the planning process, which is a requirement of the London Plan.
32. The price paid by registered providers often significantly exceeds the value of affordable housing assumed within viability assessments. Ensuring that registered providers are engaged early in the planning process helps to ensure that affordable housing is designed appropriately and that affordable housing values are realistic.

Question 16:

what factors should we take into account in updating guidance to encourage viability assessments to be simpler, quicker and more transparent, for example through a standardised report or summary format?

33. The Mayor has set out detailed guidance on how viability testing should be undertaken in his Affordable Housing and Viability SPG. Where viability testing is undertaken this is helping to safeguard against some of the significant issues that have arisen in recent years. This expands on earlier Mayoral guidance and draws on the London Borough Viability Protocol.
34. Specific issues that should be considered when reviewing national guidance on viability include the use of current day values/ forecasts, land value and viability review mechanisms. Each of these is considered below.
35. Current day values/ costs and forecasts – current guidance in PPG requires that non-phased schemes are based on current day values and cost only. This is overly restrictive and is not reflective of the operation of the market. Where recognised market forecasts for values and build costs are available these should be used to inform value and cost assumptions. Some agents argue that where forecasts are applied, target profit levels should increase. However, this has the effect of negating the impact of market forecasts and does not reflect the operation of the market. Guidance should advise against this approach. The use of forecasts does not remove the need for viability review mechanisms which are required to ensure accuracy in the viability assessment process.
36. Land value – The approach to land value considered under local plan viability testing above is also relevant in the context of site-specific testing. The reference to land value being informed by comparison with existing use value should be retained within the guidance.
37. Where a site has a low existing use value a land owner is likely to be more incentivised to release the site and there is a greater potential to achieve policy requirements. This approach is the most appropriate in planning viability assessments which are undertaken on a standardised basis. A premium can be applied (0–30% is appropriate in the majority of circumstances) as an additional incentive for the landowner depending on site

circumstances. This is part of the assessment process and is similar to the assessment of a developer return. Where existing use values are exceptionally low, for example due to a site having been cleared, it may be appropriate to allow for a greater level of premium above typical levels based on benchmarking with land values of other low existing value sites that have been assessed through the planning process. However, this should not lose sight of the absence of a high existing use value which should facilitate the delivery of plan requirements.

38. The reference to market transactions and the market norm should be removed from PPG given the extensive difficulties and manipulation of this approach that has arisen in recent cases. Caution should also be applied to an alternative use value (AUV) approach as there are a significant number of cases where unrealistic or inflated AUVs have been adopted within assessments in order to inflate the benchmark land value. Alternative uses of care homes or hotels are often relied on for this purpose⁴. A great deal of time and effort is spent assessing alternative use valuations where there is no real prospect of such schemes coming forward or an inconsistent approach has been taken between assumptions of the AUV scheme and the development proposal. An AUV approach should only be permissible in exceptional circumstances where there is an extant consent in place for the alternative use and there are overriding planning benefits in progressing with the proposed development rather than the alternative use.
39. Review mechanisms - Planning Practice Guidance provides guidance on when it is appropriate to refer to forecasts of value and costs, but it does not comment on the use of viability review mechanisms. In some cases, PPG has been interpreted to say that review mechanisms should not be used in certain circumstances. PPG should be amended to make it clear that viability review mechanisms can be secured through s106 agreements to address inherent uncertainties in undertaking viability testing at the planning stage and to ensure that this is accurate through enabling the assessment of actual values and costs.
40. The Mayor strongly supports a more transparent approach to viability. Most viability assessments are undertaken on a standardised basis which use market-based assumptions. The information submitted is largely in the public domain and is unlikely to cause harm if disclosed. National guidance should specify that viability assessments relied on as part of the planning process should be published alongside other application documents. Only in exceptional circumstances should elements of an assessment not be disclosed and only where it is robustly justified that this would cause harm to the commercial interest and overriding harm to the public interest.

Question 17:

a) do you agree that local planning authorities should set out in plans how they will monitor and report on planning agreements to help ensure that communities can easily understand

⁴ See for example 111-113 Tooting High Street, Wandsworth (APP/H5960/W/15/3138390), Huntsman Sports Club Greenwich (APP/E5330/W/16/3145602) and London Road Sevenoaks, (APP/G2245/W/15/3132303).

what infrastructure and affordable housing has been secured and delivered through developer contributions?

b) what factors should we take into account in preparing guidance on a standard approach to monitoring and reporting planning obligations?

c) how can local planning authorities and applicants work together to better publicise infrastructure and affordable housing secured through new development once development has commenced, or at other stages of the process?

41. The Mayor supports the proposals that local planning authorities should set out how they will monitor and report on s106 agreements. They should provide information on what infrastructure and affordable housing has been secured and delivered through developer contributions. This should include monitoring and reporting on the outcome of viability reviews and how financial contributions for affordable housing are spent. This can be done through the annual monitoring report process.

42. When monitoring and reporting on s106 agreements standard information should be provided, including the number and proportion of affordable units overall, by tenure and measured by habitable room. Other financial contributions, and project allocations, should also be reported, whilst recognising that an authority will not have certainty regarding receipt of a contribution until a development has been commenced and it may be necessary to combine this with funding from other sources in order to deliver a specific project where the developer contribution is not sufficient to cover the full cost. There are a range of options available to local authorities to publicise the outcome of planning decisions including through newsletters and updates on their website.

Planning fees

Question 18:

a) do you agree that a further 20 per cent fee increase should be applied to those local planning authorities who are delivering the homes their communities need? What should be the criteria to measure this?

b) do you think there are more appropriate circumstances when a local planning authority should be able to charge the further 20 per cent? If so, do you have views on how these circumstances could work in practice?

c) should any additional fee increase be applied nationally once all local planning authorities meet the required criteria, or only to individual authorities who meet them?

d) are there any other issues we should consider in developing a framework for this additional fee increase?

43. The Mayor supports the recognition of the nation-wide problem of under-resourced planning departments. He believes that fee increases should be available to those authorities that are being proactive about meeting need and delivering new homes. The criteria should not be limited to past housing delivery, but also include progress on positive planning documents that plan for growth and the number of homes permitted.

Delivery test

Question 19: having regard to the measures we have already identified in the housing White Paper, are there any other actions that could increase build out rates?

44. The GLA has been in discussion with DCLG about how a delivery test could work that reflects the different circumstances of London. The London SHMA has identified a need for 66,000 additional homes per annum between 2016 and 2041. With this significant increase in housing need in the capital, in preparing the new London Plan the GLA has made a significant push to identify more housing capacity in the new SHLAA and resultant borough-level housing targets.
45. The SHLAA pushes capacity both from large sites (those of 0.25ha and above), by optimising densities and assumptions about mixed use and colocation, and assumes a significant increase in capacity from small sites (sites of 25 units or less, with a particular focus on existing residential areas). The assessment of large sites in the SHLAA is done in partnership with the boroughs and takes account of the phasing of sites and the likelihood of them becoming available in the period. The targets in the new London Plan represent the top end of capacity in London. There are extremely limited (if any) opportunities to supplement this with a 'buffer' of land, as anything suitable would have been identified already.
46. Government funding for infrastructure and affordable housing will be key to the delivery of this ambitious target, alongside other measures set out in the Plan, the Mayor's Housing Strategy and the Housing White Paper, to diversify the industry and bring more land to market.
47. The Mayor is clear that more powers are needed to ensure the capacity translates into permissions and completions, including previously discussed proposals such as reducing the referral threshold down to 50 units, devolving powers over safeguarded wharves, and introducing a bespoke London approach to the delivery test. This should be part of the discussions between the Mayor and Government on a package of housing and planning measures.
48. The Mayor fully supports the need to increase housing delivery to meet housing needs, and this will be set out in the new London Plan and Housing Strategy. Given London's unique circumstances and housing market, the GLA considers that the delivery test in London needs to operate in a different way to the one proposed nationally if it is to have the desired effect of delivering more homes.
49. This means that gearing up for the level of delivery proposed in the plan will take time (more time than is being provided for in the government's approach). We will need to:

- Allocate and identify sites on brownfield register
- Diversify the players in the market and gear up capacity
- Deliver the requisite transport capacity and social infrastructure

50. There is a high risk that, despite boroughs and the Mayor being proactive, London will be penalised by the delivery test. Most London boroughs are up for the challenge of increasing housing delivery, but will fight against high targets if they believe they will be held solely accountable for things outside their control. This could jeopardise implementation of the new Plan, as boroughs might challenge the targets and assumptions in the Plan. This would not be in the Mayor's or government's interest as it could lead to the Plan not being found sound and thus a lost opportunity for a genuine step change in the approach to housing in London and fewer homes being built.

51. In some cases, the housing potential of a site is phased beyond a five-year period due to development being contingent on other changes before the site is ready for development (e.g. existing occupier moving on, investment in infrastructure required). Imposing a blunt 20% buffer could lead to loss of Green Belt or Metropolitan Open Land or industrial capacity which is necessary for the functioning of the city. It could also lead to an inefficient use of land and poor-quality development.

52. The White Paper proposal to assume plans are out of date would essentially move away from a plan-led to a purely reactive approach, with limited safeguards to ensure the best use of London's scarce land resource. There is no guarantee this will deliver more homes (and in fact may well deliver less, particularly if it simply results in planning by appeal and sites do not optimise density), but is almost certainly going to deliver worse outcomes in terms of efficient use of land and sustainable development.

53. London has a large and increasing stock of planning permissions and we are keen to work with Government on proposals for tools to speed up delivery of new homes, and holding housebuilders to account. The Mayor believes that increasing the level of housebuilding requires new players to complement the existing volume housebuilders. He is supporting measures to encourage more diverse sources of supply: the Build to Rent sector, small- and medium- sized builders, housing associations, and local councils.

54. The Mayor proposes that he take responsibility for the delivery test in London, building on the Mayor's long-standing role in ensuring Local Plan conformity with the London Plan, and contact with developers through pre-application meetings and referred applications.

55. The London delivery test would involve the GLA monitoring a range of qualitative and quantitative requirements against the measure of housing delivery as defined in the London Plan, rather than ONS net additional dwellings. The key measures proposed are:

- Implementing the draft new London Plan through:

- Intensification of land use and a shift to higher density across London
 - Making best use of public sector land including their own holdings
 - Enabling the development of small sites
 - Supporting build to rent
- monitoring planning decisions and appeals, consents, pipeline and completions;
 - borough progress on preparing Local Plans that provide a positive framework for development;
 - speeding up development through brownfield registers, design codes, Local Development Orders and masterplans;
 - diversifying housing supply by working positively with Registered Providers, Build to Rent providers and small builders; and
 - making the most of funding opportunities such as borough resources, Mayor's housing programmes, housing zones, new initiatives to unlock growth such as the Housing Infrastructure Fund.

If monitoring and support do not result in a shift in housing delivery, the Mayor would consider use of his powers of intervention in both plan-making and decisions. Since taking office, the Mayor has 'called-in' a number of developments for his own decision. This demonstrates his willingness to intervene to boost delivery of genuinely affordable homes.