

Examination of the Draft Lambeth Local Plan 2020-2035

Matter 2 – Spatial Strategy, Vision and Objectives

2.1 Spatial strategy

(i) The Council has indicated that in relation to paragraph 22 of the Framework, its housing policies are considered to be strategic, and the plan period for the Plan is therefore 15 years (2020-2035). The Plan provides a ten-year housing provision in line with the London Plan. Is this approach justified, and in accordance with national policy? Or should the Plan make an indicative housing provision for the remaining five years of the plan period (years 11-15)? This latter provision could perhaps be made along the lines indicated in Topic Paper 10 (Housing Provision Statement), which suggests an indicative capacity for years 11-15 from 16 large sites in the order of 2,650 additional dwellings, plus a possible continuation of the small sites allowance.

A ten-year local plan does not conform with the expectation in the NPPF 2019, para. 22, that strategic policies should look ahead over a minimum 15-year period from adoption. However, owing to the overall London housing shortfall, and the uncertainty of the housing land-supply beyond 2029, HBF considers that ten-year local plans are sensible. It is important that local plans in London are regularly updated – at least every five years – to keep abreast of changes in the evidence base and review housing land supply assumptions.

Notwithstanding this, we agree that the Local Plan should indicate its housing provision for years 11-15.

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