

LD28 Housing Delivery and Trajectory Note

2 April 2025

Aim

This note has been compiled to provide to the examination updated housing delivery information. This formed part of the discussion at the City Plan 2040 examination hearing, under Matter 3 on Wednesday 26 March 2025.

This aims to:

- Confirm the components of the housing targets over the City Plan period
- Demonstrate delivery against the London Plan housing targets over the ten years from 2019/20 to 2028/29
- Demonstrate delivery against targets over the whole of the 15-year plan period (2025/6 to 2039/40)
- Confirm no Housing Delivery Test sanctions are required
- Prove a five year housing land supply

Delivery information

As set out in paragraph 4.1.10 of the City Plan the housing target includes the London Plan target from 2025/26 to 2028/29 and then the standard method from 2029/30 to 2039/40.

Table 1 below shows the delivery against the London Plan target of 1460 over the ten years from 2019/20 to 2028/29. It is anticipated that completions will provide 2116 new housing units (equivalent, using the GLA ratios for non-self contained accommodation at paragraph 4.1.9 of the London Plan). Additionally, the City Corporation has already delivered 1056 housing units against the 1460 target. It is anticipated that this ten-year target will be met in 2027/28, one year in advance.

Table 1

Year	Numbers (after any conversion)	Status
2019/20	296	Completions
2020/21	202	Completions
2021/22	433	Completions
2022/23	96	Completions
2023/24	0	Completions
2024/25	29	Completions
2025/26	41	Completions (projected)
2026/27	97	Completions (projected)
2027/28	580	Completions (projected)
2028/29	342	Completions (projected)
	2116	

Table 2 shows delivery over the 15-year City Plan period. In this time-period housing targets are also expected to be met and exceeded with anticipated completions of 2430 against a target of 1706.

Table 2

Year	Numbers (after any conversion)	Status
2025/26	41	Completions (projected)
2026/27	97	Completions (projected)
2027/28	580	Completions (projected)
2028/29	342	Completions (projected)
2029/30	0	Completions (projected)
2030/31	120	Completions (windfalls)
2031/32	120	Completions (windfalls)
2032/33	120	Completions (windfalls)
2033/34	120	Completions (windfalls)
2034/35	120	Completions (windfalls)
2035/36	120	Completions (windfalls)
2036/37	120	Completions (windfalls)
2037/38	120	Completions (windfalls)
2038/39	190	Completions (windfalls and capacity)
2039/40	220	Completions (windfalls and capacity)
Total	2430	

The 2023 Housing Delivery Test results (as published) showed 206% delivery over the previous three years (2020/1 to 2022/23). Taking the City Corporation's latest data for these years (as shown within the tables above) this would rise to 232% (731 units delivered against the requirement of 315) therefore no sanctions are required.

In relation to a five-year housing land supply the target would include four years at 146 and one year at 102, totalling 686. Expected completions will deliver 1060 equivalent housing units, therefore no buffers are required.

It should be noted that due to the NPPF requirements, no windfall assumption has been added for year 5 however it is anticipated that delivery will come through in year five, including potential capacity from schemes currently at pre-application stage.

Appendix 2 to this note provides a full scheme-by-scheme breakdown of the components of the housing supply.

Appendix 1 to this note sets out the proposed main modifications to the plan to take into account the latest data as set out in this note. They have been added to LD27: Proposed changes and modifications.

Data discrepancies

Through the Matter 3 hearings the differences between City of London, GLA and MHCLG housing delivery information was raised. In preparation for the examination the City Corporation conducted a comprehensive data checking and cleansing process and therefore the data within this note is considered to be the definitive list of schemes permitted/completed in the Square Mile. This utilises

live planning application data from the Uniform system, other internal data sources (such as council tax data) and on-site information from site visits.

The Corporation is however aware that the data pulled digitally into the GLA's London Datahub, and then sent across to MHCLG is not always consistent. This is a known issue which affects other London Boroughs and may in part be due to the GLA's data being live (ie updatable) whereas the MHCLG data is static.

The City Corporation has analysed the differences between the datasets and these relate to phasing, and/or different splits of larger schemes, some schemes being marked in the GLA data as being completed one year earlier or later than the Corporation's data, and in some cases incorrect numbers (largely relating to the student ratio of 2.5:1). The Corporation has raised this issue with the GLA and is working on a solution.

Appendix 1- Required modifications

Chapter	Paragraph	PC Number	Main modification reason	Amended text
Chapter 4 Housing	4.1.8	PC 21 *		4.1.8 In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum.</u> However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to <u>identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u>
Chapter 4 Housing	4.1.10	PC 22		4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 (<u>an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year</u>) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...
Chapter 4 Housing	4.1.11	PC 23 *		4.1.11 The City Corporation’s housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.
Chapter 4 Housing	4.1.12	PC24 (MM3) *	Effective	4.1.12- The City Corporation’s Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial

Chapter	Paragraph	PC Number	Main modification reason	Amended text												
				development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through ‘windfall’ development rather than through the allocation of sites. City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.												
Chapter 4 Housing	New paragraph	PC25 (MM4) *	Effective	<p>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</p> <p><u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u></p> <p><u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u></p> <p><u>Table 3- Housing Delivery (Source City Corporation Monitoring data)</u></p> <table><tr><th><u>Year</u></th><th><u>Numbers (after any conversion)</u></th><th><u>Status</u></th></tr><tr><td><u>2019/20</u></td><td><u>296</u></td><td><u>Completions</u></td></tr><tr><td><u>2020/21</u></td><td><u>202</u></td><td><u>Completions</u></td></tr><tr><td><u>2021/22</u></td><td><u>433</u></td><td><u>Completions</u></td></tr></table>	<u>Year</u>	<u>Numbers (after any conversion)</u>	<u>Status</u>	<u>2019/20</u>	<u>296</u>	<u>Completions</u>	<u>2020/21</u>	<u>202</u>	<u>Completions</u>	<u>2021/22</u>	<u>433</u>	<u>Completions</u>
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Appendix 2	New appendix	PC26(MM7) *	Effective	<p><u>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</u></p> <p><u>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</u></p> <table><tr><th><u>Year</u></th><th><u>Target* per annum</u></th><th><u>Units</u></th><th><u>Status</u></th></tr><tr><td><u>2025/26</u></td><td><u>146</u></td><td><u>41</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2026/27</u></td><td><u>146</u></td><td><u>97</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2027/28</u></td><td><u>146</u></td><td><u>580</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2028/29</u></td><td><u>146</u></td><td><u>342</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2029/30</u></td><td><u>102</u></td><td><u>0</u></td><td><u>Completions (projected)</u></td></tr><tr><td><u>2030/31</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2031/32</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr><tr><td><u>2032/33</u></td><td><u>102</u></td><td><u>120</u></td><td><u>Completions (windfalls)</u></td></tr></table>			<u>Year</u>	<u>Target* per annum</u>	<u>Units</u>	<u>Status</u>	<u>2025/26</u>	<u>146</u>	<u>41</u>	<u>Completions (projected)</u>	<u>2026/27</u>	<u>146</u>	<u>97</u>	<u>Completions (projected)</u>	<u>2027/28</u>	<u>146</u>	<u>580</u>	<u>Completions (projected)</u>	<u>2028/29</u>	<u>146</u>	<u>342</u>	<u>Completions (projected)</u>	<u>2029/30</u>	<u>102</u>	<u>0</u>	<u>Completions (projected)</u>	<u>2030/31</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2031/32</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>	<u>2032/33</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>
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				<u>2033/34</u>	<u>102</u>	<u>120</u>	<u>Completions (windfalls)</u>
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				<u>2038/39</u>	<u>102</u>	<u>190</u>	<u>Completions (windfalls and capacity)</u>
				<u>2039/40</u>	<u>102</u>	<u>220</u>	<u>Completions (windfalls and capacity)</u>
				<u>Total</u>	<u>1706</u>	<u>2430</u>	

Appendix 2

Reference	Address	Units (after any conversion)	Completed year	Status
14/01006/F ULMAJ	Sugar Quay Lower Thames Street London EC3R 6EA	165	2019/20	Complete
16/00165/F ULMAJ	Site Bounded By 34-38, 39-41, 45-47 & 57B Little Britain & 20, 25, 47, 48-50, 51-53, 59, 60, 61, 61A & 62 Bartholomew Close, London EC1	131	2019/20	Complete
16/00165/F ULMAJ	Site Bounded By 34-38, 39-41, 45-47 & 57B Little Britain & 20, 25, 47, 48-50, 51-53, 59, 60, 61, 61A & 62 Bartholomew Close, London EC1	100	2020/21	Complete
16/00590/F ULL	Bernard Morgan House, 43 Golden Lane, London, EC1Y 0RS	99	2020/21	Complete
11/00602/F ULLR3	Petticoat Square Middlesex Street Estate Middlesex Street London	2	2020/21	Complete
14/00904/F ULL	53-54 Aldgate High Street London EC3N 1AL	1	2020/21	Complete
11/00905/F ULL	Site Bounded By Stone House And Staple Hall Bishopsgate Devonshire Row London EC2	160	2021/22	Complete
11/00572/F ULMAJ	Ocean House, Fur Trade House, Queensbridge House, 10 Little Trinity Lane, London EC4	9	2021/22	Complete
15/00274/F ULL	206 - 210 Bishopsgate London EC2M 4NR	5	2021/22	Complete
17/00855/F ULL	133 Middlesex Street London E1 7JF	3	2021/22	Complete
19/00072/F ULL	5 New Street London EC2M 4TP	5	2021/22	Complete
15/00141/F ULL	17 - 18 Widegate Street London E1 7HP	3	2021/22	Complete
17/00239/F ULMAJ	Emperor House, 35 Vine Street	248	2021/22	Complete
21/00271/F ULMAJ	15 - 16 Minories & 62 Aldgate High Street	87	2022/23	Complete
21/00175/F ULL	6 Breams Buildings	9	2022/23	Complete
19/00476/F ULL	Carpmael Building Middle Temple Lane London EC4Y 7AT	2	2024/25	Complete
20/00258/F ULL	8 - 10 Half Moon Court	9	2024/25	Complete
23/01296/ CLEUD	River House 119 - 121 Minories London EC3N 1DR	15	2024/25	Complete

17/00677/F ULL	79 - 79A Carter Lane London EC4V 5EP	1	2024/25	Complete
20/00498/F ULL	Great Arthur House Golden Lane Estate London EC1Y 0RE	2	2024/25	Complete
20/00723/F ULL	4 -7 Lombard Lane	2	2025/26	Under constructio n
22/00177/F ULL	Cromwell Tower	1	2025/26	Permitted
23/00529/F ULL	Cloisters, 3rd Floor North, Pump Court, Middle Temple, London, EC4Y 7AB	1	2025/26	Permitted
22/00414/F ULL	178 Bishopsgate	2	2025/26	Permitted
23/00899/F ULL	118 Middlesex Street	4	2025/26	Permitted
22/00141/F ULL	22 - 24 Red Lion Court	9	2025/26	Permitted
23/01067/F ULL	Carpmael Building, Middle Temple Lane, London, EC4Y 7AT	1	2025/26	Permitted
22/00035/F ULMAJ	122 Minories and 14 Crosswall, London EC3N 1NT	17	2025/26	Under constructio n
21/00768/F ULL	2 Burgon Street	4	2025/26	Permitted
24/00176/F ULL	45 Beech Street	97	2026/27	Subject S106
22/01243/F ULMAJ	Citicape House 61 -65 Holborn Viaduct	267	2027/28	Under constructio n
22/00882/F ULMAJ	Friary Court, 65 Crutched Friars	313	2027/28	Under constructio n
24/00648/F ULMAJ	65 Fleet Street	342	2028/29	Permitted
Total		2116		