

Royal Borough of Greenwich Local Plan

Housing Target Topic Paper (Regulation 19 Publication Draft)

July 2026

Introduction

- 1.1 The Royal Borough of Greenwich have produced a Regulation 19 Draft Local Plan. This is to ensure that Royal Greenwich continues to have robust and up-to-date planning policies that align with Council priorities. This topic paper supports Policy H1 Housing Supply and seeks to provide an overview of:
 - Past housing delivery in Royal Greenwich;
 - How we have set the housing target for Royal Greenwich in the Local Plan; and
 - Future housing supply.
- 1.2 The purpose of this topic paper is to provide additional information to evidence to explain the Council's proposed approach to maximising housing supply in Royal Greenwich and to demonstrate that the approach we have taken is positively prepared, justified, effective, and consistent with national and regional policy.

2. Policy Context

National Context

National Planning Policy Framework 2024

- 2.1 Section 5 of the NPPF is entitled Delivering a sufficient supply of homes. Paragraph 61 establishes the objective of: *“significantly boosting the supply of homes”* and states that:

“it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”
- 2.2 Paragraph 62 goes on to state that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”
- 2.3 Further to this, paragraph 69 of the NPPF states that:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.”

- 2.4 Paragraph 73 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area. As such, local planning authorities should identify through their development plan and brownfield registers land to accommodate at least 10% of their housing requirements on sites no larger than one hectare. They should also support the development of windfall sites through policies and decisions.
- 2.5 With regard to windfall sites, paragraph 75 states:
- “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”
- 2.6 Under the sub-section titled Maintaining supply and delivery, paragraph 78 states that:
- “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:
- a) 5% to ensure choice and competition in the market for land; or
 - b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
 - c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.”

Regional context

London Plan 2021

- 2.7 London Plan Policy H1 “Increasing housing supply” states:

“A Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

B To ensure that ten-year housing targets are achieved, boroughs should:

1) prepare delivery-focused Development Plans which:

- a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
- b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
- c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

- a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary
- b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets
- c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
- d) the redevelopment of surplus utilities and public sector owned sites
- e) small sites (see Policy H2 Small sites)
- f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, colocation and substitution.

3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.”

- 2.8 Table 4.1 of the London Plan sets out the 10 year targets for net housing completions from 2019/20 – 2028/29. Royal Greenwich's ten year housing target is 28,240 additional homes.

- 2.9 The housing target set for Royal Greenwich in the London Plan is based on the Strategic Housing Land Availability Assessment (SHLAA) 2017. Further information on the SHLAA is set out in paragraphs 4.1.7 and 4.1.8 of the London Plan.
- 2.10 Paragraph 4.1.11 of the London Plan goes on to state:
- “If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”

Small Sites

- 2.11 London Plan Policy H2 Small Sites states that:
- “A Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and planmaking in order to:
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- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.
- B Boroughs should:
- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
- 3) identify and allocate appropriate small sites for residential development”
- 2.12 Table 4.2 of the London Plan sets out the ten year targets (2019/20 to 2028/29) for net housing completions on small sites (below 0.25 hectares in size). Royal Greenwich’s ten year housing target is 3,010. The small sites targets in Table 4.2 are also informed by the Strategic Housing Land Availability Assessment (SHLAA) 2017.

3. Past Delivery of Housing in Royal Greenwich

- 3.1 The adopted Royal Greenwich Local Plan 2014 set a target to deliver 38,925 net additional dwellings in Royal Greenwich from 2013-2028. This is an average of 2,595 per year, as set out in the London Plan 2011.

- 3.2 This target was superseded by the adoption of the new London Plan in 2021, which sets a target to deliver 28,240 additional homes in Royal Greenwich over a ten year period from 2018/19 to 2028/29. This is equivalent to 2,824 homes per annum.
- 3.3 Housing delivery in Royal Greenwich has been below target. For example, in 2022/23 there were 1,041 completions, 2023/24 856 completions, and 2024/25 1,586 completions. As a result, Royal Greenwich current measurement in the housing delivery test is 48%, which means that the Council has to produce an Action Plan and apply the presumption in favour of sustainable development. The cumulative under-delivery against the London Plan 2021 target is 9,060 homes.
- 3.4 A number of factors have influenced housing delivery in Royal Greenwich over this period including high existing use values and build costs relative to sales values, and investors targeting student housing, which has had high returns on investment. In addition, many of the sites in the 2017 SHLAA have taken significantly longer than envisaged to come forward due to the Covid-19 pandemic, Brexit, labour shortages, build costs, and changes in regulations (for example, the introduction of second-staircase requirements for buildings over six storeys).
- 3.5 There are several large sites in the 2017 SHLAA which were anticipated to be complete by Phase 1 (2017-2019) or Phase 2 (2019-2024), but are yet to complete all development. These include: Former Car Park & Units 12, 14, 15 and 16 Gunnery Terrace, Kidbrooke Village phase 2, Enderby Wharf, Thomas Street site 1, Riverside House East, Moorhead Way, Geissler Building, Island site, Woolwich Arsenal DLR station, Kidbrooke Station, and Charlton Riverside East. As well as this, the Greenwich Peninsula Central site has over 10,000 units still left to complete, many of which were expected to have come forward already. These effectively explain our backlog against the target set by the London Plan 2021.

4. Housing target options explored

- 4.1 In the regulation 18 Draft Local Plan, Royal Greenwich stated that they would support delivery of at least 42,360 homes across the plan period (set at 2022/23-2036-2037 in the regulation 18 draft but since amended) by adopting a stepped housing target as below:

	Plan Period		
Years	2022/23 – 2026/27	2027/28 – 2031/32	2032/33 – 2036/37
Five Year Requirement	9,650	22,300	12,170

Figure 1 – Regulation 18 housing targets

- 4.2 The Greater London Authority (GLA) submitted a response to the Regulation 18 consultation where they stated that they welcomed rolling forward the London Plan Target post 2028/29 when the London Plan 2021 target ends. However, they stated that the London Plan target must be used until 2028/29 and that the local plan must explain how under-delivery against the London Plan 2021 target will be accounted for. Consequently, the Local Plan yearly target for years 2025/26-2028/29 must be 2,824 in line with the London Plan 2021.
- 4.3 Based on Royal Greenwich's Housing Trajectory and following discussions with the GLA, it was decided that the target for years 2029/30 should be reduced to reflect our capacity. This results in a target of 1,034 for 2029/30.
- 4.4 However, for years 6-15 of the plan period a range of possible approaches were assessed in determining a housing target. These are:
- A. A capacity-based assessment which derives a housing target from the 2017 London Strategic Housing Land Availability Assessment (SHLAA) and rolls over the London Plan 2021 small sites target (annualised)
 - B. A capacity-based assessment which derives a housing target from design-led capacities of sites in the Draft Local Plan site allocations, and rolls over the London Plan 2021 small sites target (annualised)
 - C. A target derived from the national 'standard method' for assessing local housing need
 - D. A target which rolls forward the existing London Plan housing target.
 - E. A target which rolls forward the existing London Plan housing target and the under-delivery against the London Plan 2021 (annualised).
- 4.5 The table below summarises the potential housing target for years 6-10 and 11-15 of the plan period for each approach.

Approach	Total target years 6-10	Total target years 11-15
A1 – London SHLAA combining phases 4 and 5	9,863	9,863
A2 – London SHLAA taking phases 4 and 5 separately	13,041	6,978
B – using site allocations with design-led capacities	13,679	13,679
C – the standard method	12,460	12,460
D – rolling forward LP2021 target	14,120	14,120
E – rolling forward LP2021 target and adding under-delivery	18,650	18,650

Figure 2 – Housing target options for Regulation 19 years 6-15

- 4.6 The below section goes through each of these approaches to the housing target for years 6-15 in turn, to explain why we ultimately took forward approach E – a target which rolls forward the existing London Plan housing target and the under-delivery against the London Plan 2021 (annualised).

Option A: A capacity-based assessment which derives a housing target from the 2017 London Strategic Housing Land Availability Assessment (SHLAA) and rolls over the London Plan 2021 small sites target (annualised)

- 4.7 Paragraph 4.1.11 of the 2021 London Plan states that if a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings and any local evidence of identified capacity and roll forward the housing capacity assumptions applied in the London Plan for small sites. Therefore, an initial approach was to set a target using 2017 SHLAA, from the capacity identified in Phase 4 (April 2029-March 2034) and Phase 5 (April 2034-March 2041) of the 2017 SHLAA, combined with the annualised London Plan 2021 small sites target.
- 4.8 There are two possible ways of using the 2017 SHLAA to set a target. One is to combine the sites from phases 4 and 5 and assume the total target (of 21,916 units) should be delivered evenly across 2029/30-2040/41 (excepting 2029/30 where the target is set to 1,034 in order to demonstrate a 5YHLS). This leads to a target of 1,973 per year between 2030/31 to 2039/40 (after adding on the annualised small sites target from London Plan 2021).

- 4.9 The other possibility is considering the units in phases 4 and 5 separately. This means splitting the phase 4 units (11,475) across 2029/30-2033/34 (with again the 2029/30 target set at 1,034 units), and the phase 5 units (10,441) across 2034/35-2040/41. This means a yearly target of 2,911 between 2030/31 and 2033/34, and of 1,396 units between 2034/35 and 2039/40 (adding on the annualised small sites target from London Plan 2021 in both cases).
- 4.10 Neither of these approaches were taken forward as they result in either all, or some of the yearly targets to be below the London Plan 2021 target which is unlikely to be accepted by the GLA. As well as this, these approaches do not take into account new site allocations, permissions, or capacity testing which Royal Greenwich has undertaken. In discussions with the GLA, it was suggested that as the 2017 SHLAA was out-of-date, an approach which took into account capacity testing that Royal Greenwich undertook would be more appropriate, and in line with London Plan paragraph 4.1.11.

Option B: A capacity-based assessment which derives a housing target from design-led capacities of sites in the Draft Local Plan site allocations, and rolls over the London Plan 2021 small sites target (annualised)

- 4.11 As stated above, in discussions with the GLA, it was decided that the 2017 SHLAA was out of date and should not be taken forward to create a housing target for years 6-15 of the London Plan. Therefore, in line with paragraph 4.1.11 of the London Plan which states “boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA” the next option was a capacity-based target based on the design-led capacity of site allocations in the Draft Local plan. These sites did not have planning permissions and so went through a design-led process to determine the number of homes that could be delivered on each site.
- 4.12 The predicted completions on these sites from 2029/30 to 2039/40 was summed (starting from 2029/30 as before this, the units would be counted towards the London Plan 2021 target), adding up to 25,383 units. The 1,034 units target for 2029/30 was subtracted from this and the remaining units were spread equally across years 6-15 of the plan (to ensure the units are delivered over years 2029/30-2039/40 and since the 2029/30 target is set by the need to demonstrate 5YHLS). Adding on the annualised small sites target as per London Plan paragraph 4.1.11, this led to a yearly target of 2,736, and so a target of 13,679 in years 6-10 and 11-15.
- 4.13 However, this process resulted in a housing target that was below the London Plan 2021 target so it was considered to be too low. An

alternative approach would have been to include all sites in the draft local plan site allocations in the target, rather than only those that have been capacity-tested. However, this would include almost all of the large sites expected to come forward in the plan period. With additionally adding on our small-sites target, this target would be beyond the predicted delivery of Royal Greenwich and therefore was considered not viable. With the current outlook for the housing market, it would be unlikely to consistently meet this target so this approach was not taken forwards.

Option C: A target derived from the national 'standard method' for assessing local housing need

- 4.14 The NPPF 2024 states that planning authorities should use the Standard Methodology for plan-making, but, as noted above it introduced a new methodology for calculating the figure which is underwritten by the size of the existing dwelling stock, not the household projections for an area. As Royal Greenwich's housing target is set by the London Plan, the borough is not ordinarily subject to the standard method.
- 4.15 The December 2024 Local Housing Need figure for Royal Greenwich was 2,575 dwellings per annum. New affordability data was released in March 2026 and new dwelling stock data in May 2026, so the figure was updated to 2,492 dwellings per annum. As this figure is lower than the London Plan 2021 yearly target, it is unlikely that the GLA would agree for it to be taken forward. Therefore, this approach was not chosen.

Option D: A target which rolls forward the existing London Plan housing target.

- 4.16 The annualised London Plan 2021 target is 2,824 units per year and is in place until 2028/2029. In this option, Royal Greenwich would roll forward this target for years 6-15 of the plan period. This would result in a total target of 14,120 for years 6-10 and the same for years 11-15. In the Regulation 18 Local Plan, the London Plan 2021 annualised target was rolled forward in years 6-15 and the GLA stated that this was welcomed. However, the GLA stated that clarity should be provided on whether Royal Greenwich is seeking to include any past under-delivery against the London Plan target. As this approach does not take into account under-delivery, it was not taken forward.

Option E: A target which rolls forward the existing London Plan housing target and the under-delivery against the London Plan 2021 (annualised).

- 4.17 This method rolls forward for years 6-15 the annualised London Plan 2021 target of 2,824 units per year, and includes an annualised amount of completions in order to make up current under-delivery against the London plan 2021 target, which is currently 9,060 units. In order to find this target, the overall under-delivery of 9,060 was divided by ten to create an annualised target (906). This was then added onto the annualised London Plan 2021 target (2,824) to result in a final yearly target of 3,730 units. This results in an overall target of 18,650 units for years 6-10 and the same for years 11-15. It was decided that this approach should be taken forward, as it includes an approach that was welcomed by the GLA and accounts for the borough's under-delivery which will be made up for in the 6-15 years of the Local Plan.
- 4.18 Royal Greenwich plans to meet the housing target in the Local Plan through existing permissions for committed schemes, site allocations and windfall development. To this end, the Draft Local Plan includes 54 site allocations, the majority of which are allocated to deliver new homes in addition to other uses.
- 4.19 Furthermore, NPPF paragraph 73 states that local planning authorities should identify through their development plan and brownfield registers land to accommodate at least 10% of their housing requirements on sites no larger than one hectare. Royal Greenwich are compliant with this – with our housing trajectory predicting that 18% of units will be delivered on sites under one hectare.
- 4.20 Figure 3 below shows the final yearly housing targets for the plan period:

25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33
1	2	3	4	5	6	7	8
2,824	2,824	2,824	2,824	1,034	3,730	3,730	3,730

33/34	34/35	35/36	36/37	37/38	38/39	39/40
9	10	11	12	13	14	15
3,730	3,730	3,730	3,730	3,730	3,730	3,730

Figure 3 – Yearly housing targets for years 1-15

5. Conclusion

- 5.1 A range of approaches to setting a housing target for years 6–15 were tested, including capacity-based methods using the 2017 SHLAA, design-led site capacities, and the national standard method. These were all discounted as they either relied on out-of-date evidence, produced targets below the London Plan 2021 benchmark (and therefore unlikely to be supported by the GLA), or resulted in

unrealistically high and undeliverable figures. Simply rolling forward the London Plan 2021 target was supported in principle by the GLA but did not address existing under-delivery. The preferred approach therefore rolls forward the London Plan target of 2,824 homes per year while also incorporating an annualised allowance to address the current shortfall. This results in a higher annual target of 3,730 homes and ensures both alignment with GLA expectations and a clear strategy to make up past under-delivery over the remainder of the plan period.

- 5.2 The Council acknowledges that the London Plan is currently being reviewed and will result in a new capacity-based housing target for Royal Greenwich. Whilst the new draft London Plan published in July 2026 requires Royal Greenwich to deliver a minimum of 27,850 homes over the period 2027/28-2036/37, the Council considers there is capacity to deliver more than this provided developers bring forward the sites identified in the draft Local Plan.
- 5.3 Once any new London Plan housing target for Royal Greenwich is published in its final form, this will supersede the housing target in the new Royal Greenwich Local Plan. The GLA are aiming to publish the new London Plan in its final form in the next few years (following examination in public). Consequently, the housing target included in the new Royal Greenwich Local Plan may only apply for a short period of time.