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Planning Design Economics

**LONDON BOROUGH OF BROMLEY
HOUSING SUPPLY STRATEGY
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1.0 INTRODUCTION

- 1.1 This Housing Supply Strategy has been prepared by Nathaniel Lichfield and Partners (NLP) in response to an instruction from the London Borough of Bromley (LBB) to examine the robustness of current housing projections. This follows the publication of the Interim Inspector's Report on the Local Plan Inquiry that took place between 28th October 2004 and 15th April 2004.
- 1.2 In terms of housing, the Bromley Unitary Development Plan (UDP) makes provision for 11,450 additional dwellings to be provided between 1997 and 2016. This figure is derived from the 1999 Housing Capacity Study carried out jointly with the former London Planning Advisory Committee (LPAC) and published by the GLA in 2000.
- 1.3 The Inspector's interim report identifies what she considers to be a shortfall in the level of housing provision identified by LBB, of approximately 1,000 units relating to the period up to 2001. As a result, the Inspector recommended a full sequential analysis of all potential housing sites be undertaken to include analysis of some Green Belt and Metropolitan Open Space sites that were the subject of objections and the identification of reserve sites if appropriate housing provision is not made.
- 1.4 The purpose of this Housing Supply Strategy is to evaluate all of the Council's available housing monitoring data in order to establish whether the Inspector's findings are correct and if there is any shortfall in housing supply and provision in the LBB. The purpose is not to undertake a full Urban Capacity Study. In terms of its remit, this report does not consider the capacity of the LBB's education or health care facilities or deal with the Open Space Strategy issues specified in the Interim Inspector's Report.
- 1.5 The Council's monitoring information and windfall allowance has been assessed to ascertain the current housing provision against UDP provisions. The Strategy then sought to review the dynamics of the local housing market, in order to identify any unusual local market characteristics, if indeed these exist, and seek explanations of the reason for their occurrence. The influence of any such characteristics on housing provision within the Borough is explained.
- 1.6 The Strategy has sought to ensure that any shortfall in LBB's housing provision can be addressed and that this can be achieved in a sustainable way. A detailed sequential analysis of all potential housing sites has been undertaken, including some

Green Belt and Metropolitan Open Land, as requested by the Inspector. Advice in PPG3, on the 'sequential approach', has been used as a basis for examining sites to determine the most appropriate development locations.

- 1.7 The culmination of the sequential analysis is the production of a series of tables of sites that are grouped in order of their suitability. A sustainability appraisal of the resulting sites then serves to evaluate which of the identified sites are the most sustainable. This will assist the Council in identifying which, if any, of the sites should be considered in order to address any potential shortfall in housing provision.
- 1.8 It is recognised that, in considering the suitability of a site for allocation within the UDP, all sites should be assessed on their own merits and against the background of the relevant local, regional and national planning policy. The strategy adopts a scoring system when setting out the key characteristics of the sites in terms of their sustainability; to provide a definitive 'score' for each to be used for comparative purposes, however it is not the aim of the strategy. In view of the unique characteristics of each site, direct comparison between sites is not always straightforward and, therefore, the final analysis reflects the results of a more qualitative assessment of the merits of each site. This analysis takes account of the broad spectrum of characteristics demonstrated by the sites that have been assessed, identifying those that NLP consider are most appropriate for housing development in sustainability terms. We have not, however, been requested to review the deliverability of these sites: the assessment is, however, largely based on sites that have been proposed by objectors to the UDP and other identified sites, suggesting that these are likely to come forward within the Plan period.
- 1.9 The aim of the Strategy is therefore not to be too prescriptive, but to retain a degree of flexibility that will enable the Council to interpret the results of the Strategy in a way that will best suit the continually changing requirements of LBB over the coming months/years and to be utilised to determine its final response to the Inspector's Report and subsequent policy.
- 1.10 It is important to note that this strategy has been prepared to inform the LBB to assist their consideration of the Inspector's Report. It is for the Council to determine how they may wish to use this report to address the issues highlighted by the Inspector.

2.0 POLICY BACKGROUND

Introduction

- 2.1 This section outlines the key policy issues at national, London-wide and local level which have been taken into account in the preparation of this report. It is not meant to be an exhaustive examination but sets the context for the analysis that follows in later sections.

PPG 3 (Housing)

- 2.2 Planning Policy Guidance Note 3 (Housing) was published in 2000 and was in place when the First Deposit Draft of the UDP was produced and is referred to by both LBB and the Inspector. This guidance sets out the Government's policies on housing.
- 2.3 One of the principal policy objectives contained within PPG3 is for sufficient new homes to be provided in the right place and at the right time. The achievement of this vision has significant and far ranging implications in terms of meeting the aims of economic prosperity, social equity and environmental protection. By contrast, failure to realise these objectives will have the potential to unsettle both the housing market and the wider economy, increase affordability problems and thereby exaggerate issues relating to access into the housing market and undermine the achievement of a more efficient and sustainable use of land.
- 2.4 It places an onus on local planning authorities (LPAs) to:

“plan to meet the housing requirements of the whole community, including those in need of affordable and special needs housing;

provide wider housing opportunity and choice and a better mix in the size, type and location of housing than is currently available, and seek to create mixed communities;

provide sufficient housing land but give priority to re-using previously-developed land within urban areas, bringing empty homes back into use and converting existing buildings, in preference to the development of greenfield sites;

create more sustainable patterns of development by building in ways which exploit and deliver accessibility by public transport to jobs, education and health facilities, shopping, leisure and local services;

make more efficient use of land by reviewing planning policies and standards;...” (paragraph 2)

- 2.5 This advice emphasises the need to provide adequate housing, and the need to ‘plan, monitor and manage’ (paragraph 8) the delivery of housing.
- 2.6 In addition to identifying the need to assess local housing requirements and affordable housing, PPG3 describes the government’s commitment to sustainable patterns of development (paragraph 21). This requires the concentration of housing development in urban areas, and the re-use of previously developed land and buildings. Local planning authorities are required to assess the capacity of urban areas, and adopt a sequential approach to the allocation of housing land, and manage its release, taking account of windfalls.
- 2.7 Paragraph 46 requires local planning authorities to promote development linked to public transport and mixed use development, with paragraph 54 emphasising the need for quality in design and the need to consider the existing characteristics of the area.
- 2.8 With respect to densities, in order to encourage the best use of land, paragraph 58 requires densities between 30 and 50 dwellings/ha, with greater intensity in areas of good public transport accessibility.
- 2.9 Paragraph 76 emphasises the need for effective monitoring.
- 2.10 It is accepted, both by PPG3 and ‘*Tapping the Potential*’, that the identification of sites where residential development might occur is always subject to uncertainty. Changing circumstances can often mean that sites which were considered unlikely to be released for residential development may become available. “*Planning to Deliver*” recognises that ‘*for many authorities windfall sites will make an important contribution to housing supply and their impact should not be underestimated*’ (page 11). Whilst ‘*Tapping the Potential*’ provides the basis for an analysis of potential development sites within urban areas, it notes that ‘*for a variety of good reasons, ... local plans will not always be able to allocate for development all potential housing sites uncovered by the capacity study. Therefore, even with the most thorough of capacity studies, windfalls are likely to arise*’ (page 11).

PPG2 (Green Belts)

2.11 Planning Policy guidance Note 2 (PPG2 - Green Belts) sets out government guidance on measures that the local planning authorities should take into consideration in respect of Green Belt land. In terms of the context of LBB, the key purposes of Green Belt land, as set out in paragraph 1.5 of PPG2, are as follows:

'To check the unrestricted sprawl of large built up areas;

To prevent neighbouring towns from merging together;

To assist in safeguarding the countryside from encroachment;

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'

2.12 All of these factors are important considerations for LBB in identifying additional housing provision to meet the shortfall identified in Section 4.

2.13 PPG2 establishes a general presumption against inappropriate development. Such development would only be granted in very special circumstances, and very special circumstances to justify inappropriate development will not exist unless the harm by reason of its inappropriateness is outweighed by other considerations. In terms of the uses that are considered to be appropriate, these include; agriculture and forestry, outdoor sport and recreation, cemeteries, limited extension to existing dwellings and infilling of existing villages, limited infilling or redevelopment of major developed sites (MDSs).

2.14 In order to seek to justify the allocation of Green Belt land for development, it is necessary for LBB to demonstrate that the land does not meet the intentions or purposes of Green Belts and/or 'exceptional circumstances' by establishing that there is a shortfall in housing provision and demonstrating that all available alternative locations for housing development provision in non Green Belt locations had been exhausted. In the Inspector's Report, she felt that, from the information available, brown field sites may be exhausted and the greenfield opportunities should now be considered. She felt that this could constitute 'exceptional circumstances' if it can be demonstrated that all other more sustainable options have been exhausted.

PPG17 (Sport, Open Space and Recreation)

2.15 Reference should also be made to restrictive policies concerning the development of open space and the loss of playing pitches and schools.

2.16 Paragraph 10 of PPG17 states that:

'Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements'.

London Plan

2.17 The London Plan was adopted in February 2004, by the Greater London Authority (GLA), during the Bromley UDP Inquiry. This provides up to date strategic level policy which now forms part of the statutory development plan. It is therefore of significant importance to the context within which this report has been prepared. There is a specific section on housing and housing supply which is of particular relevance to this report. Recognised in the London Plan is the need for an increase in housing provision across the whole of London. Two key policies are important to highlight. Policy 3A.1 states:

"The Mayor will seek the maximum provision of additional housing in London towards achieving an output of 30,000 additional homes per year from all sources. Housing provision up to 2006 will be monitored against a minimum target of 23,000 additional homes per year,...."

Policy 3A.2, Borough Housing Targets, states:

"UDP policies should:

- *seek to exceed the figures in Table 3A.1 and to address the suitability of housing development in terms of location, type of development and impact on the locality;*

- *identify new sources of supply having regard to:*

- *major development in Opportunity Areas and in the London parts of the Thames Gateway and London-Stansted-Cambridge growth areas and redevelopment of low density commercial sites to secure mixed use residential development*

- *change of use of unneeded industrial/employment land to residential or mixed use development*

- *redevelopment in town centres, suburban heartlands and small scale residential infill*

- *intensification of housing provision through development at higher densities particularly where there is good access to public transport*

- *review existing identified housing sites and include existing and proposed housing sites on Proposals Maps. The capacity of housing*

sites should be determined in accordance with the urban design and density policies of this plan..”

2.18 The table below (from the London Plan) details, on a borough to borough basis, the additional homes targets up to 2016. The target for LBB is 11,450. This matches the housing requirements made in the draft Bromley UDP, the subject of this report.

Areas	Total target	Annual monitoring target	Areas	Total target	Annual monitoring target
Central sub-region			West sub-region		
Camden	16940	850	Brent	13510	680
Islington	18070	900	Ealing	12930	650
Kensington and Chelsea	10800	540	Hammersmith and Fulham	8040	400
Lambeth	28910	1450	Harrow	6620	330
Southwark	29530	1480	Hillingdon	8890	440
Wandsworth	16470	820	Hounslow	9450	470
Westminster	19480	970	Sub-total	59440	2970
Sub-total	140200	7010	North sub-region		
East sub-region			Barnet	17780	890
Barking and Dagenham	10110	510	Enfield	13180	660
Bexley	5520	280	Haringey	19370	970
City	2100	110	Waltham Forest	9140	460
Greenwich	16090	800	Sub-total	59470	2980
Hackney	14310	720	South sub-region		
Havering	6900	350	Bromley	11450	570
Lewisham	17350	870	Croydon	17020	850
Newham	17770	890	Kingston	6710	340
Redbridge	10860	540	Merton	8610	430
Tower Hamlets	41280	2070	Richmond	5360	270
Sub-total	142290	7140	Sutton	7400	370
			Sub-total	56550	2830
			London	457950	23000

source London's Housing Capacity, GLA, 2000

Table 1: London's Housing Capacity, GLA, 2000 Table 3A.1

2.19 LBB, therefore has a statutory requirement to provide 11,450 new housing units between 1997 and 2016. The Borough must include housing policies in its UDP and monitor provision rates as well as allocating sites for future housing development. The GLA's housing targets are based upon the LPAC Housing Capacity Study (HCS), which is discussed in further detail in Chapter 4 of this report. This study is currently being updated within a London-wide Urban Capacity Study, which will input to future Alterations to the London Plan. LBB has been informed by the GLA that a draft

housing provision is likely to be published in June 2005, which will be adopted late in 2006.

2.20 The London Plan also indicates that there is a presumption against inappropriate development in Green Belt, affording the same level of protection to Metropolitan Open Land (MOL).

2.21 The designation of Metropolitan Open Land (MOL) is unique to London and aims to protect strategically important open spaces within the built environment. It is stated in paragraph 3.248 of the London Plan (2004) that MOL is the same as Green Belt in terms of protection from development and serves a similar purpose. The London Plan recognises that MOL serves the following three valuable functions:

- *“Protecting open space to provide a clear break in the urban fabric and contributing to the green character of London;*
- *Protecting open space to serve the needs of Londoners outside their local area;*
- *Protecting open space that contains a feature or landscape of national or regional significance”.*

2.22 In paragraph 3.249, the London Plan stipulates that the boundary of MOL should only be changed in exceptional circumstances through the UDP process and development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate.

2.23 Although UOS is not afforded the same level of protection as MOL, it still plays an important role. The London Plan recognises the importance of public open space. Paragraph 3.252 states that:

‘Development on local open spaces will not be acceptable where they have been designated for protection in a UDP or where there is a demonstrable need for that open space...’

London Borough of Bromley UDP

2.24 The Adopted Unitary Development Plan was adopted in 1994. The review of the UDP, which is now reaching its final stages, began in June 1996.

2.25 The First Deposit Draft of the Plan was available for public consultation from 26th March until 10th May 2001. The Second Draft Deposit was available for public consultation between 19th September and 31st October 2002.

- 2.26 The Inquiry into unresolved objections to these draft plans was held between October 28th 2003 and April 15th 2004. An interim report on housing and open space was produced by the Inspector conducting the inquiry and received on 26th August 2004. This interim report included a summary of objections and the Inspector's conclusions and recommendations. General objections as well as objections to specific policies and parts of policies are referred to in the Inspector's Report. The final report has now been received by LBB, which incorporates the Interim Report.
- 2.27 The Inspector's Interim Report refers (paragraph 4.1.1) to the need to provide 11,450 dwellings, a figure which is derived from the 2000 Housing Capacity Study and referred to in the London Plan (as stated above). She also states that the Borough is correct to adopt a capacity led approach as advocated in PPG3. The 2000 Housing Capacity Study remains the most up to date study. However, she feels that given the need to accommodate 30,000 additional dwellings in London per annum (the London Plan), the figure of 11,450 may need to be revised upwards.
- 2.28 In paragraph 4.7.2 of the Interim Report the Inspector notes that it is very difficult in the London Borough of Bromley to identify previously developed land due to the predominantly suburban characteristics and a lack of redundant sites. In the following paragraph she goes on to say that from the proposed UDP policies it is clear that the development of all open spaces of value (local or strategic) will be resisted by the Council. She disagrees with this approach stating:

"it would be wrong to apply the same level of protection enjoyed by Green Belt and Metropolitan Open Land to other areas of open space."

She continues, stating:

"I do not therefore advocate protection of all open spaces and the Council should assess development proposals using the sequential approach set out in PPG3 and in terms of policies that have established a hierarchy of open spaces."

- 2.29 In the London Plan the 30,000 figure for housing provision represents a 30% increase on the figure included in the earlier Draft of the same document. The Inspector considers that this increase should not be reflected in the UDP. When the more up to date Housing Capacity Study has been produced for the whole of LBB, its ability to provide dwellings will be established. The Inspector considers that until then it would be premature to increase the housing requirement. Furthermore, she reflected that it does not necessarily follow that an overall increase in housing figures for London will

be reflected on a pro-rata basis for all the Boroughs. However in paragraph 4.8.7 she states:

“Nevertheless, what this does mean is that LBB needs to be in a position to increase housing delivery rates in the future if required to do so”.

- 2.30 The Inspector warns against the reliance on windfall sites to meet housing requirements and instead places the onus on LBB to identify sufficient sites for housing. She also says that the Council is underperforming against its own targets in the provision of houses while acknowledging that she does not have complete and up to date statistics. Furthermore, she indicates there is a possibility that the disparity between permissions and completions may not be as great as it seems, the reasons for which are unclear. She places the disparity in the order of 1,000 units until the year 2001. This shortfall is the one which the UDP must seek to address. She points out that the Local Authority should have sought to address this issue when it first became apparent and changed their strategies accordingly.
- 2.31 She is unconvinced that granting more permissions for housing development would automatically result in a parallel rise in housing completion figures but agrees that *“...measures are required to address the growing gap between capacity and output...”*
- 2.32 To address this issue she indicates that the UDP needs to be proactive in identifying additional sources of housing supply and capacity. She refers again to windfall sites, saying that it is difficult to predict the supply from this source resulting in the *“...uncertainty regarding the delivery of a large proportion of the housing in the UDP.”* She recommends that this be countered by the identification of *“reserve sites”* although recognising that there may be difficulties in doing so. She states that there is now some urgency for the LBB to review all possible options and to undertake *“a full sequential analysis of all potential sites”*.
- 2.33 The Inspector recommends that an Open Space Strategy for the Borough be produced in line with the London Plan’s requirements and points out that Green Belt and Metropolitan Open Land sites are protected by policy and therefore can only be developed in exceptional circumstances. Lacking an Open Space Strategy and possessing only limited information on certain sites, the Inspector felt that she was unable to recommend one site for housing development over another.

2.34 She recommends that a sequential analysis be carried out on potential sites including those identified in the UDP and that the aforementioned reserve sites are designated within the UDP. The Inspector indicates that policy is not “encouraging enough” development of housing and that there is no mechanism to assess the suitability of windfall sites.

Conclusion

2.35 This section has described the policy background which has led to the need to review LBB’s housing strategy.

2.36 The London Plan includes the results of the London Capacity Study, which forms the basis of its assumptions for housing provision up to 2016, which should be provided without recourse to Green Belt or MOL. PPG3 supports the re-use of previously developed land on a sequential basis and PPG2 resists ‘inappropriate development’ in the Green Belt unless ‘exceptional circumstances’ exist.

2.37 The evidence presented to the Inspector, including representations from the GLA, LBB and objectors, led her to conclude that the delivery of housing at its present rate will not meet the minimum number of 11,450 dwellings included in the draft UDP and London Plan.

2.38 The Inspector also concluded that LBB should undertake a full review of all potential sites on a sequential basis and introduced the notion of ‘reserve sites’, although this has no foundation in planning policy, including PPG3 or the London Plan.

2.39 LBB, therefore, has to undertake this exercise to respond to issues raised in the Inspector’s report.

2.40 LBB should also continue to review its GB and MOL boundaries, on the basis of the role of locations in meeting the fundamental aims of GB and MOL. This should not be led by the desire for housing sites, but must be a sensible definition of boundaries. On a secondary level, some of these re-definitions of boundaries may provide potential housing sites, which should be tested on a sequential basis.

3.0 METHODOLOGY

Introduction

- 3.1 This section provides an overview of the methodology adopted in the preparation of this Strategy. More detailed information on the approach to our technical analysis is provided in the relevant sections of this report.
- 3.2 The methodology for the assessment of housing provision in LBB has been developed taking into account the requirements of Government guidance including PPG3, *'Tapping the Potential – Assessing Urban Housing Capacity: Towards Better Practice'* produced by the ODPM (December 2000) and *'Planning to Deliver - The Managed Release of Housing Sites Towards Better Practice'* (July 2001) produced by the ODPM. The information contained in these documents and recent ministerial statements provides a robust basis for addressing potential sources of urban housing capacity.
- 3.3 The methodology for the assessment can be broken down into the following key stages:
- Reassessment of current housing monitoring information;
 - Review of the dynamics of the local housing market;
 - Reassessment of potential housing densities on allocated sites;
 - Assessment of all known sites;
 - Inspector's appraisal;
 - Sequential Testing; and
 - Sustainability appraisal;

These are discussed in turn below.

Re-assessment of Current Housing Monitoring Information

- 3.4 This report examines the housing monitoring information that has formed the basis of the Council assessment and which underpins assumptions on housing provision in LBB for the plan period (1997-2016) as the accuracy of this information is vital in shaping the future direction of development within LBB.

- 3.5 The purpose of this analysis has been to establish whether the Inspector's assumptions are correct and, if there is a shortfall in housing provision, consider the extent of this shortfall. This also assists in establishing whether the misgivings expressed by the Inspector about the Council's monitoring procedures, the numerical basis of the Plan, its reliance on windfall releases and hence the deliverability of its overall housing requirement within the period, are justified.

Completions

- 3.6 LBB monitoring data on completions has been reassessed in order to establish a complete and accurate picture of the current position in terms of housing provision.

Unimplemented permissions

- 3.7 On sites where planning permission has been granted, but where development has not commenced, the extent of unimplemented permissions has been assessed in order to seek to establish whether there is any reason for the non-implementation of planning permissions.

Windfalls

- 3.8 '*Tapping the Potential*' (ODPM 2000) recognises that local plans will not always be able to allocate for development all potential housing sites and windfalls are likely to arise. LBB has made substantial provision for windfall sites within the Second Deposit Draft Plan with these accounting for 42% of the total housing capacity. As a result of the uncertainty that the Inspector considers exists in connection with the delivery of housing provision, this report assesses LBB's assumptions on housing windfalls as set out in the Second Deposit Draft UDP; in particular, whether these assumptions are robust and deliverable.
- 3.9 Any over-estimation of housing numbers by LBB has been considered against projections produced by the GLA and neighbouring authorities in order to ensure that any identified trends follow those found in comparative locations.
- 3.10 In summary, this report assesses all of LBB monitoring data in an attempt to establish:
- an accurate indication of outstanding dwelling requirements;

- whether sufficient land is allocated for development in order to meet the housing requirement;
- whether the windfall capacity estimates are realistic and achievable; and
- whether the phasing and distribution of development accords with the wider spatial strategy of the Plan.

Review of the Dynamics of the Local Housing Market

- 3.11 A review of the dynamics of the local housing market has been undertaken to establish the current characteristics of the market and identify whether any underlying factors exist that may be affecting the delivery of housing within LBB.
- 3.12 The Strategy has reviewed the housing completions against planning permissions of other south east London boroughs in order to establish whether LBB performs poorly against these similar authorities. It has also analysed permissions which have not been implemented.
- 3.13 This review has enabled a comparative analysis of the market value of dwellings that have been sold in LBB against other London Boroughs to determine its performance in terms of price. We have also provided details of sites currently under construction to give an indication of activity.
- 3.14 The above information has then been utilised to examine whether there are any particular characteristics of the local Bromley market and if this impacts on the delivery of housing provision.

Re-assessment of Potential Housing Densities on Allocated Sites

- 3.15 A review of the housing densities put forward for all allocated sites within the UDP has been undertaken. The methodology adopted for this review is informed by the guidance contained within PPG3, the London Plan and the requirement to make best use of development opportunities whilst taking account of the existing characteristics of LBB.
- 3.16 The aim of this re-appraisal of housing densities is to seek to establish whether the density proposed by LBB represents the 'best use' of the land, is 'sustainable' and is in accordance with the guidance contained in PPG3 (paragraph 57) and the London Plan.

- 3.17 In view of the unique characteristics of each site, direct comparison between sites is not always straightforward or possible and, therefore, the final analysis reflects the results of a more qualitative assessment of the merits of each site.
- 3.18 In undertaking this review it is acknowledged each site must be considered on its own merits as unique characteristics/local circumstances may exist that influence the density considered appropriate on a site. LBB is a suburban Borough characterised by relatively low densities; whilst it is important to examine all possible potential to increase densities in appropriate locations, new residential development must not conflict with the dominating character or the urban grain.

Assessment of all Known Sites

- 3.19 A thorough assessment of all known sites has been undertaken including all proposal sites that have previously been considered by LBB, omission sites i.e. (those put forward by objectors to the review of the UDP and subsequently rejected by the Council) and a re-evaluation of all UOS.
- 3.20 The merits of all of these sites, have been re-evaluated to consider whether any of the sites, including those previously rejected by both the Council and the Inspector in her Interim Report, should be re-considered for allocation in the light of a requirement for additional housing provision in the Borough. The sites have been assessed using the criteria for sequential assessment as set out in PPG3.

Proposal Sites

- 3.21 All the sites that have been proposed for housing development in the First and Second Deposit Draft versions of the UDP have been assessed in order to ensure that they represent both sequentially preferable and sustainable allocations. This approach also enables a clear comparison to be drawn between the allocated sites and those that have, hitherto, been rejected by the Council and/or dismissed by the Inspector.
- 3.22 A detailed explanation of the methodology used for the assessment of these sites is set out in Section 7 of this report.

Omission Sites

- 3.23 All of the 46 omission sites, which include sites in the GB and MOL, have been re-evaluated in order to assess whether they should be reconsidered by LBB for allocation for housing.
- 3.24 A desk top study was initially undertaken. Sites that were identified as being worthy of further assessment were then visited and subjected to a more detailed sequential assessment and sustainability appraisal. The analysis of these sites has been reported with a brief description of the site and its surroundings, site location plan, together with a description of the amount of development that could be accommodated.
- 3.25 The remaining sites were ruled out for a variety of reasons as they were considered to be inappropriate for allocation for housing. This approach is in accordance with the comments of the Inspector contained in her Interim report where she acknowledged that there would be little merit in including such sites in any comparative analysis. A schedule summarising the results of the desk top analysis is attached at Appendix A.
- 3.26 The comments of the Inspector contained in her Interim Report were also taken into consideration in the assessment of the omission sites and all sites that she indicated should be included in the comparative assessment have been reassessed.

Urban Open Space

- 3.27 The assessment of all known sites has included an analysis of all UOS sites of 0.5 hectares or over. However, following consultation with LBB it was agreed that the sites containing the following would be excluded from this assessment:
- playing pitches;
 - formal play equipment; or
 - woodland.
- 3.28 The remaining sites were subject to a comprehensive desk top analysis which assessed the potential and suitability of the sites against the criteria outlined in Section 5 of this report (based upon guidance contained in PPG3).

- 3.29 The sites that were identified as being worthy of further assessment have then been subject to a more detailed sequential assessment, the results of which are presented in Section 7 of this report.

Inspector's Appraisal

- 3.30 The Inspector's Report recommended that the Council undertake what she described as:

"..... a complete and proper sequential analysis of all potential housing sites within the Borough and in the interests of completeness, parity and transparency.... such an analysis should include sites already identified in the UDP"

- 3.31 The Inspector set out clear guidelines on how she considered that the 'comprehensive and sequential analysis' should be undertaken. In line with the guidance contained within PPG3, the Inspector indicates that the search sequence should start with all previously developed land and buildings within urban areas identified in the Housing Capacity Study (HCS) and that LBB must establish that all such sites are allocated before moving on to the next sequentially preferable option of urban extensions.
- 3.32 In terms of identifying potential sites for additional housing provision, the Inspector indicates that LBB must first establish, unequivocally, that all such sites are exhausted or unavailable; and then, should LBB need to look beyond the first sequentially preferable option, they must look next to urban extensions in accessible non GB/MOL locations; and then to such extensions in accessible GB or MOL sites.
- 3.33 The Inspector confirmed that the sequential approach to testing the suitability of housing sites should be utilised, including UOS, MOL and GB sites.
- 3.34 The Inspector indicated that the need to identify additional housing land, coupled with a paucity of non-GB/MOL land for such purposes, could constitute the sort of exceptional circumstances that justify a limited and focussed review of GB or MOL boundaries.

Sequential Testing

- 3.35 The remit of this study is not to repeat work that has already been undertaken by LBB in terms of sequential analysis, but to revisit and review the work that has been

undertaken whilst taking into consideration the views expressed by the Inspector in her Interim Report.

3.36 A process of sequential analysis, following the criteria set out in PPG3, was used to re-assess the sites that were identified as warranting further assessment of their potential to contribute towards additional housing provision in the Borough.

3.37 The sites were all assessed against the following criteria, as set out in PPG3:

- Previously developed site;
- Location and accessibility;
- Capacity of existing and potential infrastructure; and
- Physical and environmental constraints on the development of the land.

3.38 In accordance with the principles established in PPG3 the results have been presented in tabular form with separate tables produced for the following:

- Proposals sites (1DD & 2DD);
- Previously developed land;
- Urban Open Space, GB and MOL.

3.39 In addition, where relevant, the potential of the site to create a defensible and enduring GB/MOL boundary was also considered in accordance with guidance contained within PPG2 (paras 2.8-2.9).

3.40 A more detailed qualitative analysis of the potential of the site for further consideration by LBB is attached in the accompanying text, included in Part II of this report. A schedule containing the further analysis for the sites which are not considered suitable for further consideration is attached at Appendix A.

Sustainability Appraisal

3.41 In order to provide a comparative analysis of the merits of various sites for further consideration for housing provision by LBB, a sustainability appraisal has been undertaken. The methodology for the sustainability appraisal has been adapted from a similar study undertaken by Barnsley Council during the review of the Barnsley Unitary Development Plan and subsequently further developed to provide a sequential approach to determining planning applications for residential development,

contained in Planning Advice Note 30 (PAN30) and the Council's Sustainability Checklist (Annex 3).

3.42 The sustainability assessment has enabled a comparative analysis of the sites and facilitated their ranking in order to demonstrate their suitability to meet sustainable criteria. Three broad levels have been identified, as follows:

- Level 1 - Sites that are considered sequentially preferable and sustainable locations for allocation for housing.
- Level 2 - Sites that demonstrate some sustainable characteristics which the Council should consider for the allocation of housing.
- Level 3 - Sites that are considered to be unsustainable and should not be allocated for housing.

3.43 A copy of the Sustainability Checklist that sets out the methodology used for the sustainability appraisal is attached at Appendix B.

3.44 Each of the Level 1 and 2 sites was then subject to an assessment in terms of density of development and achievable numbers of units.

Conclusions and Recommendations

3.45 The report then considers all of this information to make a series of recommendations to the LBB to enable a response to the Inspector's report and the formulation of a strategy for housing provision in the future.

4.0 ASSESSMENT OF LONDON BOROUGH OF BROMLEY'S MONITORING INFORMATION AND HOUSING FIGURES

Introduction

- 4.1 It is of great importance that LPAs consider how they might meet the housing targets that they have been set by the relevant Regional Spatial Strategy or Spatial Development Strategy (including the London Plan). Rather than being an isolated process, this should be integrated into a longer-term monitoring and review mechanism so that specific problems with the delivery of housing capacity can be identified and rectified as soon as they arise.
- 4.2 Effective policy making and reliable monitoring is dependant upon the provision of a robust and rigorous numerical background data. In particular, policy making and monitoring should ensure that:
- an accurate indication of outstanding dwelling requirements is provided;
 - sufficient land is allocated for development in order to meet the global housing requirement including London Plan provisions;
 - the windfall capacity estimates contained within the Plan are realistic and achievable; and
 - the phasing and distribution of development accords with the wider spatial strategy of the Plan.
- 4.3 This will be significant in enabling LBB to resist proposals for development in inappropriate locations, such as GB or MOL.
- 4.4 In the Inspector's Report, she expressed some concerns about the Council's monitoring systems, the numerical basis of the Plan, its reliance on windfall releases and therefore, the deliverability of its overall housing requirement within the period to 2016. She suggested that, in these circumstances, the provision of 'reserve sites' should be made in the Plan. In light of this, the purpose of this Section is to provide a detailed assessment of the monitoring data and housing figures that form the basis of the UDP.

Review of Housing Monitoring Information

- 4.5 Following the UDP Inspector's criticism of LBB's monitoring of housing completions data, which the Council itself described as *'incomplete and inadequate'* (Bromley

Second Deposit Unitary Development Plan: Note on Housing Land Supply, paragraph 4; UDP Inspector's Report, paragraph 4.8.13), a key requirement of this Housing Supply Strategy is to review and re-assess the current housing monitoring data. This will ensure that accurate and reliable figures can be given for the number of dwellings that were completed in the early years of the Plan period (1997-2004) and the number of outstanding planning permissions that exist at the defined base date (June 2004).

Completions Data

- 4.6 LBB has provided the study team with three sources of monitoring data dating back to 1997:
- LBB Housing Monitoring Completions 1, 1997 – 2003;
 - LBB Housing Monitoring Completions 2, 1999 – 2004; and
 - New unit completions, 2001 – 2004.
- 4.7 The Housing Monitoring Completion system records the number of dwellings on completed sites. By contrast, the new unit completions spreadsheet records individual dwellings as they are completed (rather than once work on site has ended); hence, this approach provides the opportunity to undertake a more sensitive analysis of development over time, both on specific sites and across the Borough.
- 4.8 The different data sets were provided by LBB to ensure that the study team had as much information as possible about recent housing completions within the Borough.
- 4.9 The initial stage in the review of LBB's monitoring data was to ensure that there was consistency between the sources of data described above. The databases were cross-checked to obtain a complete and accurate picture of housing development in LBB. Particular attention was given to ensuring that no individual unit has been omitted from the monitoring data and no dwelling had been counted more than once. In undertaking this process, the team was aware that the data sets had originally been created for different purposes. Whilst the Housing Monitoring Completions database was created for the specific purpose of monitoring development rates, the new unit completions data was collected for a specific purpose for the Council's Education Department. For this reason, it indicates the number of dwellings that had been completed at a particular point in time, rather than providing an on-going record of development.

4.10 Having compiled a 'master list' of housing completions, the records were assessed to set out the number of dwellings that had been built within the LBB in each year from 1997. For the period 2001 – 2004, we were able to use the new unit completions data to provide a greater level of detail – essentially recording completions within large sites on a dwelling by dwelling basis, rather than according to the completion of all work on site. This enabled us to provide a more accurate indication of the number of dwellings constructed during any particular year.

4.11 Having undertaken this analysis, a number of issues relating to the reliability and compatibility of the monitoring systems have become apparent:

- Some sites and dwellings appear to have been counted more than once by LBB – although the scale of double-counting is generally considered to be modest in the context of the overall level of development.
- In some cases, the Council has failed to appropriately differentiate between gross and net increases (i.e. resulting from a failure to take account of any existing units that were to be demolished as part of the development process). However, again, the scale of this discrepancy is limited in the context of the overall level of development within LBB.
- As the Housing Monitoring system only records dwelling numbers once work on site has ended, it fails to record a large number of recent additional units on large developments that are still under construction (e.g. GlaxoSmithKlein Wellcome Research Labs and Bromley Hospital). This is particularly the case for larger sites, which are recorded once the development is completed and may take some time for the development to cease. This may have led to an underestimation of the number of completions.
- The new completions data failed to record dwellings that were the subject of retrospective applications or certificates of lawful use (for changes of use). We understand that this is due to the intended role of the system (to assist the Education Department on a specific project) and the nature of the source material used (building control records, which would not have indicated change of use applications). However, we believe that it is important that these should be included if the completions monitoring data is to provide a reliable record of new dwellings, which are presently included within LBB's Housing Monitoring Completions 1 and 2.

4.12 Although we recognise that there are explanations for each of these issues, they could have some bearing upon the accuracy and reliability of the past trends data used to inform and support the UDP strategy. By cross-checking the data sources, it was possible to identify cases in which these problems had arisen and ensure that any ensuing inaccuracy was overcome.

4.13 The number of housing completions between January 1997 and June 2004 are set out below. This table is based upon our analysis of the data contained within the

Housing Monitoring Completions and the New Unit Completions systems. We believe that it therefore provides the most accurate record of past completions. Having compared the figures with those set out in the Council's own records, we are satisfied that they are largely compatible.

Year	Net Completions
1997	250
1998	444
1999	71
2000	416
2001	459
2002	526
2003	408
2004 (to 30 June)	295
TOTAL	2,869

Table 2: Number of Housing Completions - January 1997-June 2004

The reason for the 1999 figure being so low relates to the demolition of 130 units on the Groves Estate, which were not subsequently replaced. LBB's Housing Monitoring Completions 2 system had recorded these demolitions in 2001 when all work on site ceased, rather than in 1999, when the reduction in dwelling number is most likely to have occurred.

- 4.14 This evidence confirms the Inspector's conclusion that residential development has not been coming forward at the required rate:

'It is clear that the housing output since 1997 has fallen short of the current annual target and that, as a result, there is now a deficit that needs to be addressed, in addition to achieving a higher rate of completions in the coming years. I accept that the scale of the present deficit is a matter of some contention and cannot be correctly established without reliable and detailed data. As it stands, there is no other evidence before me to come to a different figure and without such evidence I must assume that there is a deficit in the order of 1,000 to the year 2001.' (UDP Inspector's Interim Report, paragraph 4.8.14).'

- 4.15 The requirement for 11,450 new dwellings between 1997 and 2016 equates to an annual delivery target of approximately 570; on this basis, in the order of 2,860 units should have been provided between 1997 and the end of 2001. In fact, only 1,640 units were completed over this period – a shortfall of over 1,200 units.

- 4.16 The Inspector went on to suggest that *'there is nothing in the evidence to suggest that completion rates have increased since 2001'* (paragraph 4.8.14). This is confirmed by our analysis. If net completions had been coming forward at the required rate, almost 4,300 additional units would have been built in the first 7½ years of the Plan period. In reality, 2,869 were built - 67% of the requirement, leaving a shortfall of some 1,400.
- 4.17 On this basis, annual completions must now increase to over 680 in order to ensure that the UDP housing requirement can be achieved before 2016.

Unimplemented Permissions

- 4.18 In addition to completions to date, the housing strategy should also take account those dwellings that benefit from outstanding planning permission and which may yet be developed during the Plan period, counting towards the overall housing requirement. LBB has provided information on outstanding permissions dating from 1997. Our initial desk based assessment of this information, leads to the conclusion that there has been no double counting with the housing completion records. Details of these are set out in Appendix H.
- 4.19 As with all other planning permissions, residential permissions are usually subject to a condition requiring implementation within five years (this implementation period has now been changed to three years). Our analysis has therefore identified those unimplemented permissions which have now expired (according to the five year implementation period) and excluded them from our recommended commitments figure (see Appendix O).
- 4.20 In reality, not all outstanding planning permissions will be implemented. A non-implementation figure of 10% is commonly accepted in most locations, although this is normally expected to be greater in London. A greater proportion of permissions have remained outstanding in Bromley which was discussed at length at the Inquiry and was considered by the Inspector:

'The reasons for the disparity between completions and permissions were debated at the Inquiry. LBB argue that the market is not delivering ... it may also be the case that permissions are sought for valuation purposes and then not implemented when expectations are not met.' (UDP Inspector's Interim Report, paragraph 4.8.13).

- 4.21 A more detailed analysis of the implementation of permissions is set out in Section 5, including a comparison between other London Boroughs and a sample of these applications.
- 4.22 Although it is most unlikely that all of the outstanding planning permissions will be implemented, it would be difficult to set a reliable and defensible non-implementation quota. Moreover, to do so would not be in the best interests of achieving a sustainable housing strategy, in line with the requirements of PPG3.
- 4.23 In light of this, our analysis sets out the figure for all of those permissions that could be lawfully implemented. As of 30 June 2004, there were 20 planning permissions for large sites (more than 10 units) which could be implemented, amounting to a total capacity of 707 dwellings. In addition, 484 units remained outstanding on small sites. Hence, for the purposes of this analysis, we have assumed a total level of commitments of 1,191 units.

Comment

- 4.24 The UDP housing strategy is founded upon a requirement for 11,450 additional dwellings to be provided in the period 1997-2016. To date, 2,869 units have been completed and 1,191 are committed for development. Accordingly, the net outstanding requirement, to be met through windfall releases and the identification of specific sites, is 7,390 units.

		No. Dwellings
UDP Housing Requirement		11,450
(less) Completions to 30. 6. 04	2,869	
Outstanding planning permissions (at 30. 6. 04) –		
Large sites	707	
Small sites	484	
<i>Total Deductions</i>	<i>4,060</i>	
Net Outstanding Requirement (from 1. 7. 04)		7,390

Table 3: Summary of LBB Housing Requirements 1997-2016

Review of Windfall Estimates

4.25 The housing strategies contained in the UDP should make provision for windfall releases in addition to identified sites. However, the scale of the overall reliance upon windfall sites tends to vary considerably. In the Draft Second Deposit UDP, large windfalls account for 42% of the total housing capacity:

Source	Net additional dwellings
Large identified sites	1,734
Large windfalls	4,564
Large identified offices	230
Large office windfalls	150
Small sites	2,880
Small conversions	1,600
Non self-contained permanent accommodation	300
TOTAL	11,458

Table 4: Summary of UDP Housing Allocations

Source: LBB 2nd Deposit Draft UDP. Table 4.1

4.26 By way of comparison, windfall development is expected to account for 64% of the overall housing requirement in Southwark, yet only 9% in Greenwich (London Housing Capacity, 2000; Annex 3: Borough and London Profiles, pages 139 and 143). According to LBB, this scale of reliance upon windfall releases, is only slightly above the London average (37%) (London Housing Capacity, 2000; Executive Summary, Annex 3: Borough and London Profiles, page 145). This *'reflects the realities of housing land supply in London and is by no means atypical'* (Bromley Second Deposit Unitary Development Plan: Note on Housing Land Supply, paragraph 5). Moreover, the Council has indicated that a large number of dwellings have previously come forward from this capacity source and it is demonstrated that *'there is every reason to assume that the future rate of windfall development will continue'* (Bromley Second Deposit Unitary Development Plan: Note on Housing Land Supply, paragraph 5).

4.27 In spite of this justification, a common objection raised at the UDP Inquiry was that the Plan is overly reliant upon unidentified windfall sites, which are not likely to be released at the rate necessary to meet the Borough's dwelling requirement.

4.28 Considering these objections, the UDP Inspector stated:

'The likely future windfall potential was assessed in the HCS and the figure used in that study has been adopted in the UDP. However, it is not clear whether the allowance for windfall sites was made on the basis of examining past trends, ... whilst this source has provided a major contribution to the supply of housing in the past, and is predicted to do so in the future, LBB agree that supply from this source is inherently difficult to predict.

'The net result is that there remains a significant degree of uncertainty regarding the delivery of a large proportion of the housing in the UDP. Therefore whilst it is possible that the housing figures may come forward as predicted, there is no assurance that this is the case... '
(UDP Inspector's Interim Report, paragraph 4.8.19-4.8.20).

- 4.29 In light of this, the Inspector concluded that it is appropriate to reappraise the potential level of delivery from identified sites in order to reduce the reliance upon windfalls and to establish a contingency to ensure additional releases in the event that the Council's monitoring systems indicate an under-supply.
- 4.30 Rather than merely relying upon the identification of additional 'known sites' as a means by which the windfall reliance might be reduced, it is also important to ensure that the windfall capacity set out in the draft UDP is robust and deliverable.
- 4.31 The housing capacity figures, set out in Table 4.1 of the draft UDP were derived from the Housing Capacity Study (HCS), published in 2000 by the London Planning Advisory Committee (LPAC), and as such, any criticism levied against the LBB strategy relates to the approach and findings of this. The HCS was used to inform the London Plan and was reviewed in some depth as part of the Examination in Public.

Housing Capacity Study

- 4.32 Published in 2000, the LPAC HCS was the third London-wide study of housing capacity. Its purpose was to estimate the housing potential within London over the 20 year period 1997 to 2106. Its findings were used to inform the London Plan and individual Unitary Development Plans and as such, it served a central role in the delivery of housing growth and the creation of sustainable communities. The GLA is presently in the process of updating its capacity figures, in order to inform modifications to the London Plan.

4.33 The study identified capacity for a total of 458,000 additional dwellings (including non-conventional sources); this equates to an annual capacity of 23,000 units, a figure that was shown to be broadly in line with the long term completion rate (19,000 dwellings). Of this total capacity, 37% (over 140,000 units) are to be provided on windfall sites).

Methodology

4.34 The approach taken by LPAC divided housing sources into identified large sites, for which specific yield estimates could be made according to actual site characteristics, and other sources which could not be individually identified, for which global yield figures were derived based upon benchmarks figures. The benchmark figures took account of previous capacity estimates, historic development rates, locally identified capacity and forecasts from specific 'subject studies' into additional sources of capacity.

4.35 It was found that previous studies had under-estimated the capacity of large windfall sites by a factor of four. The study therefore included windfall assumptions based upon past trends.

4.36 Each of the 33 Boroughs was asked to respond to a range of housing capacity issues. This provided a local-level review of known sites, windfall and small site capacity and benchmark figures. The involvement of London Boroughs was important in ensuring that the findings of the study were relevant to individual areas, whilst the co-ordination by LPAC ensured consistency of approach and output.

4.37 As the study predates the publication of '*Tapping the Potential*', its approach does not accord with that presented by the Government's good practice guide. However, it is described in "*Tapping the Potential*" as '*a very comprehensive study*', albeit that '*some potential sources of capacity were not examined*' (Annex B, Case Study 5).

4.38 The general view of the London Boroughs was that the Study had been worthwhile in providing better information and a greater level of understanding of housing development trends. It also helped them to meet the strategic housing requirements, to assess existing planning policies and to inform their UDP review process. The results contributed to the identification of more housing sites and therefore a greater level of clarity within the planning system in London.

Analysis of the London Housing Capacity Study (HCS)

- 4.39 The purpose of the HCS was to estimate the housing potential of the Greater London area. Its objective was to inform the preparation of the London Plan and assist individual Boroughs in the preparation and review of their Unitary Development Plans. The results were set out according to different components of capacity and planning phase and were disaggregated into three spatial scales – Borough-wide, LPAC sectors (Inner East, Inner West, Outer East and Outer West), and London as a whole.
- 4.40 By implication the level of detailed analysis provided for any individual Borough is consequently less than might otherwise be provided by a Borough-specific study. In some instances, information is not set out to all spatial scales and it has therefore been difficult to accurately assess the contribution of LBB to the overall capacity within London.
- 4.41 Although the study was based upon material supplied by Borough Councils, this background information is not set out within the main report or the appendices. Furthermore, the material used to prepare benchmarks for windfall capacity (1992 Housing Capacity Study and data on historic rates of windfall provision – indicated as being set out in Annexes 10 and 11 to the 2000 study) has not been made available.
- 4.42 This has meant that it is not possible to audit the validity of the windfall capacity assumptions for Bromley alone without undertaking a review of the whole study.

London Plan Examination in Public

- 4.43 The validity of the figures contained within the HCS was considered in some detail by the Examination in Public to the London Plan. The Panel Report notes that the methodology adopted by the HCS was subsequently commended in *'Tapping the Potential'*. Indeed,

'EIP participants included a number who had been involved in the HCS, and this contributed to a searching discussion of the results and hence of the basis of the draft Plan's housing allocations.' (Draft London Plan – EIP Panel Report, paragraph 4.14)

- 4.44 In the light of this, and given the previously noted lack of material that would enable an independent assessment of the HCS at this time, we have thoroughly reviewed the submissions made to the EIP as well as the Panel's findings in order to test the

overall validity of the HCS and the extent to which it can therefore be relied upon to set the basis for Bromley's housing strategy.

- 4.45 It was argued by a number of participants that the HCS was outdated. The publication of the Communities Plan, the revised PPG3 and 'Tapping the Potential' each contributed towards an enhanced policy context wherein greater emphasis is now being placed upon increasing housing output and enhancing the sustainability of development. Moreover, it was also indicated that the HCS was founded upon an inherently circular premise – it had been undertaken to assess London's capacity to accommodate the housing requirement set out in the previous RPG3, but the result was now being put forward as the basis for future planning policy.
- 4.46 The implication of these criticisms was that the HCS had under estimated the overall level of capacity that was likely to be available for residential development within London over the period to 2016. Given that it had only identified the capacity to deliver 23,000 units per annum out of an overall demand of 31,900, and given the increasing importance of sustainability considerations, this has been viewed as a major failing.
- 4.47 The reasons cited for this apparent shortfall relate to the Study's reliance upon now-outdated density standards, its under-estimation of the potential to release employment land for residential purposes, its over-stating of vacancies and conversions and an inconsistent application of the methodology across the different Boroughs.
- 4.48 A number of Boroughs made representations to the draft London Plan questioning the housing requirement that had been set, based upon the HCS. In light of this, the Association of London Government undertook a survey of the Boroughs' latest views so that these could be discussed at the EiP. The survey found that 17 of the 33 Boroughs did not identify a change in local circumstances and accepted the target figure set out in the draft London Plan; of these, seven Boroughs indicated that they expect to be able to achieve a higher housing provision than their HCS-based draft Plan figure. This was principally arising within Thames Gateway Boroughs, although this increase was shown to be dependant upon infrastructure delivery and implementation mechanisms.
- 4.49 Conversely, ten Boroughs indicated that a lower figure would be appropriate. This would result in a cumulative reduction in capacity of about 32,000 units. Whilst two of

these Boroughs dispute the approach of the HCS, the remainder justify the change in approach in terms of more recent local assessments showing lower figures, revised expectations about windfall sites and concerns over allowances for vacancy reduction, conversions and self-contained accommodation.

- 4.50 LBB was amongst the Boroughs that accepted the figure set out in the draft London Plan. This indicates a continued optimism regarding the reliability of the windfall estimates and their applicability to the local context.
- 4.51 In line with many of the objections, the Panel concluded that the HCS can no longer be relied upon to provide an accurate measure of housing capacity within London over the period to 2016. The request for a review of the study was upheld and the Mayor's commitment to this was welcomed. However, the Panel did not consider that interim adjustments would be either appropriate or helpful.
- 4.52 Although a number of concerns now exist regarding the findings of the London HCS, it is accepted that to make changes at this stage, in advance of the revised study, would risk increasing rather than overcoming these stated problems. This would particularly be the case in seeking to adjust the windfall figures for LBB alone; the results would be based upon a different methodology and data to that for the remainder of the London Boroughs, thereby reducing the comparability of the figures.

Implications for Bromley Housing Strategy

- 4.53 The LBB's proof of evidence on Housing Supply, which was produced as part of the UDP Inquiry (LBB/Housing/H1), provides further evidence in support of the windfall requirement contained within the draft Plan. It is demonstrated that the capacity estimate was based upon historical experience of those sites coming forward between 1987 and 1996, thereby addressing the Inspector's question regarding the basis of the windfall allowance and her uncertainty as to whether this has been '*made on the basis of examining past trends, as recommended by PPG3*' (UDP Inspector's Report, paragraph 4.8.19).
- 4.54 The evidence also confirms the point that London has traditionally been very reliant upon windfall sites to meet UDP housing requirements. The principal source of supply in Bromley has historically been from sites within existing predominantly suburban residential areas which have not been easily identifiable in advance.

- 4.55 The main message contained within the EIP Panel Report and LBB's evidence is that whilst there are concerns about the reliability of the HCS, it would be unwise to seek to adjust the figures at this stage. Rather, detailed monitoring of land releases should be undertaken in order to provide a basis for the action to be taken in the event of housing targets not being met.
- 4.56 An additional matter that should be noted relates to the apparent discrepancy between the objections to the UDP housing policies and the London HCS. Objectors to the London Plan stated that the HCS had significantly under estimated capacity and that the translation of its results into the London Plan would further compound existing housing shortages. By contrast, the principal objection to the Bromley UDP was that the housing strategy was based upon an over-estimation of capacity and was therefore unlikely to be achieved. The reliance on windfall releases was taken as particularly significant in this regard:

'There remains a significant degree of uncertainty regarding the delivery of a large proportion of the housing in the UDP... whilst it is possible that the housing figures may come forward as predicted, there is no assurance that this will be the case.' (UDP Inspector's Report, paragraph 4.8.20).

- 4.57 In essence, pressure was seen at a London scale to increase capacity estimates and at the local level to reduce capacity estimates. This further highlights the difficulty of reviewing the HCS-derived windfall estimates for LBB alone.
- 4.58 In light of this, we do not consider that it would be possible to provide a sufficiently robust review of the windfall capacity estimates contained within the draft UDP. Whilst recognising that some difficulties do exist in relation to the HCS, we accept that it continues to represent the most comprehensive study of capacity and, in advance of the revised study, continues to offer the *'best available basis for monitoring housing provision'*. (Draft London Plan – EIP Panel Report, paragraph 4.19; UDP Inspector's Interim Report, paragraph 4.8.5).

Analysis of Outstanding Housing Shortfall

- 4.59 The previous two sub-sections have demonstrated that:

- the release of housing capacity within Bromley has been significantly below the level that is required to meet the overall housing target within the Plan period; and
- although concerns exist over the LPAC based windfall capacity estimates, these are the most robust figures and reliable estimates currently available.

4.60 In this sub-section, we bring these two issues together by highlighting the scale and nature of the outstanding housing provision shortfall.

4.61 The housing capacity figures contained within the Bromley UDP indicate the estimated supply for the 20 year period from 1997 to 2016. Although the table set out within the UDP provides no indication of the anticipated phasing of this supply, the LPAC study disaggregated its results for each Borough into four equal periods. The results for LBB are set out below:

Source	1997-2001	2002-2006	2007-2011	2012-2016	Net additional dwellings
Large identified sites	1,192	542	0	0	1,734
Large windfalls	457	913	1,597	1,597	4,564
Large identified offices	115	115	0	0	230
Large office windfalls	0	0	75	75	150
Small sites	720	720	720	720	2,880
Small conversions	400	400	400	400	1,600
Vacancies	0	0	0	0	0
Non self-contained permanent accommodation	75	75	75	75	300
TOTAL	2,959	2,765	2,867	2,867	11,458

Table 5: LPAC Housing Supply for LBB 1997-2016 (Phases)

Source: GLA, London Housing Capacity Study, 2000. Annex 3.

4.62 This table demonstrates that the supply from each capacity source is not anticipated to be linear. Rather, the identified sites were anticipated to come forward during the first part of the Plan period, with windfall releases becoming increasingly significant during later phases.

4.63 For the purpose of this analysis, we have identified three broader capacity sources – large known sites (including large identified offices); large windfalls (sites and offices); and small sites (including vacancies and non-self contained permanent accommodation). The supply for these sources for each of the 5 year periods is set out below:

Source	1997-2001	2002-2006	2007-2011	2012-2016	Net additional dwellings
Large identified sites/ offices	1,307	657	0	0	1,964
Large windfalls / offices	457	913	1,672	1,672	4,714
Small sites	1,195	1,195	1,195	1,195	4,780
TOTAL	2,959	2,765	2,867	2,867	11,458

Table 6: Simplified Housing Provision for LBB (1997-2016)

4.64 Annex 4 to the LPAC study listed 57 sites that are anticipated to contribute to the large identified sites and offices sources. Details of these are set out at Appendix C.

4.65 According to this requirement, a total of 4,341 dwellings should have been provided within the Borough between 1997 and June 2004:

Source	Net additional dwellings 1997-2004
Large identified sites/ offices	1,635. 5
Large windfalls / offices	913. 5
Small sites	1,792. 5
TOTAL	4,341. 5

Table 7: Net Additional Dwellings (1997-2004)

4.66 From our review of completions within LBB, it has been possible to analyse the number of dwellings that have been built on large identified sites, through the release of large windfall sites and on small sites – in line with normal practice, this has been defined as sites accommodating less than 10 units (which is the threshold for major residential development).

4.67 Details of all completions in each of these capacity sources are set out in Appendices D-G.

4.68 A comparison between the number of completions and the level of requirement in each capacity source highlights the scale of this shortfall:

Source	Requirement 1997-2004	Completions 1997-2004	Completions %	Shortfall
Large identified sites/ offices	1,635. 5	996	60. 9	639. 5
Large windfalls/ offices	913. 5	631	69. 1	282. 5
Small sites	1,792. 5	1,242	69. 3	550. 5
TOTAL	4,341. 5	2,869	66. 1	1,472. 5

Table 8: Completions and Level of Requirement Comparison

- 4.69 As previously indicated, outstanding planning permissions remain at a total of 1,191 dwellings. This figure comprises 348 units on identified large sites, 437 units on large windfalls and 484 units on small sites. Even in the unlikely event that all of these units come forward, this is insufficient supply to meet the requirement for the remainder of the second phase to 2006. Given that the delivery of additional housing within any two year period is generally considered to be reliant upon planning permission being in place at the commencement of that time, this demonstrates that LBB is not in a position to meet its short term housing requirement in the remainder of the second quartile of the Plan period. As such, the current shortfall can be expected to rise at least over the next two years if not over the longer term.
- 4.70 In terms of longer term supply, there is a particular concern with respect to windfall development. The rate of windfall release has not met the requirement for the first part of the Plan period. From 2007, the requirement for windfall releases rises significantly; the failure to meet lower targets raises significant questions about the extent to which the higher levels of supply can be achieved. The implications of the level of windfall development upon the overall housing strategy are even greater when the extent to which the housing target is reliant upon windfalls is considered.
- 4.71 It is therefore necessary to consider how the rate of windfall development might be increased. We have identified large windfall sites as those that were not specifically identified in the LPAC Housing Capacity Study. Previously unknown sites may still become available in the future. Accordingly, the opportunity exists to review potential sites and to appraise their likely housing capacity over the period to 2016. This will lead to the achievement of the large windfall/office quota, rather than the large identified sites/offices requirement, which relates only to the 57 sites set out in the Housing Capacity Study (the full achievement of which will require efforts to increase the delivery rate of such sites from the current 61%). Any site not named in the HCS

is therefore defined as a windfall, even if it is now to be identified in advance of its release.

- 4.72 We believe that by identifying windfall opportunities, it will be possible to create greater certainty within the Plan and help to increase the rate of delivery, thereby overcoming the concerns that have been expressed in relation to the high reliance upon unknown sites and the prospect that the windfall development requirement will not be achieved.

Conclusion

- 4.73 As of July 2004, a housing shortfall of some 1,500 units, compared to UDP and London Plan targets, had arisen. If LBB is to meet its housing requirement within the Plan period, this deficit must be overcome. We therefore recommend that this should be undertaken by identifying new sites to overcome this shortfall.
- 4.74 In addition, efforts must be made to increase the delivery of new dwellings to ensure that future housing requirements are met. We believe that the anticipated increase in windfall requirements in the third and fourth quartiles necessitates the identification of capacity to accommodate at least an additional 500 dwellings. This would increase the prospect of ensuring the required delivery of housing requirements in the latter part of the Plan period, whilst also retaining the potential for a substantial release of unknown sites.
- 4.75 Based on this level of provision continuing, we recommend that sites with capacity for at least 2,000 units should be identified to meet this shortfall.
- 4.76 In considering the sites that might accommodate the additional housing capacity, the Council should pay regard to the deliverability and phasing of development and whether they should seek to top load development to the earlier stages. The LBB must also ensure that a constant supply of sites can be delivered, in order to meet the requirement in each of the remaining stages of the Plan period. Failure to do this could undermine the ability to meet the overall housing target in the long term.
- 4.77 It is also essential that monitoring information is up to date and that actual rather than estimated figures are provided.

4.78 LBB must also ensure that accurate and reliable monitoring systems are put into place with triggers to indicate when the supply from any of the capacity sources is not coming forward at the required rate.

5.0 LOCAL DYNAMICS OF HOUSING MARKET

Introduction

- 5.1 Section 4.0 of this report referred to the delivery of planning permissions and the Inspector's comments regarding local dynamics.
- 5.2 In order to understand the delivery of housing permissions, it is important to appreciate whether the circumstances at the LBB are unique, or reflect other similar authorities. We have therefore reviewed the housing completions/permissions figures at the London Boroughs of Bexley, Croydon, Greenwich, Lewisham, and Southwark, to assist with this analysis.
- 5.3 The GLA conducted a survey in 2004 of all the London Local Planning Authorities to establish both the number of housing units which received planning permission, and the number of housing units which were completed, between the years 1987 and 2003. This also included records on conversions and bringing dwellings back into use. These figures are based on information submitted to the GLA by these Authorities.

Methodology

- 5.4 Five years is considered to be a robust period of analysis, as this was, until recently, the standard time limit for detailed planning permissions. This has now reduced to 3 years. The period of 1999 to 2003 is the most recent five year sample available. The annual figures for permissions and completions are added for each borough. A further calculation is undertaken to ascertain, for each borough, the proportion or percentage of planning permissions which are actually completed. The results are summarised on the table below.

Local Authority (London Borough)	Permissions	Completions	Percentage
Bromley	3,171	2,001	63%
Bexley	1,861	1,394	75%
Croydon	4,359	2,108	48%
Greenwich	6,963	5,135	74%
Lewisham	3,330	2,948	88%
Southwark	9,445	3,715	39%
Greater London Authority (total)	138,510	91,356	66%

Table 9: Comparative Residential Planning Permission: Completions - 1999-2003

Source: GLA – Housing Provision Survey 2002/2003

- 5.5 Although this information is of a rather basic nature, it is the most up to date relevant available information on permissions and completions. It provides a good “snapshot” of LBB’s performance in terms of implementing planning permissions for housing and can be easily compared to the performance of neighbouring London Authorities (although we understand that some of the 2002/2003 data for LBB is estimated). The average implementation percentage figure across the entire sample of neighbouring Local Authorities is 64.5%. LBB’s implementation percentage figure is 63% and is, therefore, only slightly below average. An average taken across the whole of the Greater London area reveals a figure of 66%; again LBB performs slightly below average. From this comparative exercise, it is evident that LBB’s figures fall within the middle performing Boroughs in this analysis. This is slightly below average, but LBB is some way from the poorer performing London Boroughs.
- 5.6 From this initial evidence, it is considered that further investigation is required to determine whether there are serious implementation issues, as suggested in the Inspector’s report which is included within this section of the report. It is evident that a rate of 63% does provide scope for improvement and remains an issue to be addressed; this is reinforced by the fact that the annual rate of completions is falling below targets required to meet the housing provision for the plan period.
- 5.7 We have also reviewed the housing policies for the poorest performing Boroughs in our sample - Croydon and Southwark - to ascertain whether they have made provision for ‘reserve sites’ or refer to delivery of permissions.

- 5.8 The London Borough of Croydon's UDP is currently at the pre-Inquiry stage having been deposited twice. The Inquiry is due to begin on the 15th of March 2005. There are two housing policies of relevance to this report; SP19 and SP20. In policy SP19 there is reference to the need to provide 17,020 dwellings between 1997 and 2016, which equates to 850 per annum. There will be a system put in place to "*plan, monitor and review*" provision. SP 20 refers to the need to accommodate much of this housing development on previously developed land. It is also proposed that, if necessary, additional housing can be accommodated on surplus sites, preferably in accessible locations. Specific sites are not identified. Details of delivery and the use of "reserve" sites are not discussed in this document.
- 5.9 The London Borough of Southwark is in a similar position in the preparation of their UDP. The Public Inquiry will begin in April of 2005. The Second Deposit Draft contains no information as to delivery of housing and only briefly mentions its housing requirements (although not divulging the number of units required). They do, however, place particular emphasis on the adequate provision of affordable housing and mixed use schemes. There is also no reference to "reserve" sites.

Current Housing Developments

- 5.10 To gain an indication of the level of current activity in LBB, we have reviewed the number of developments that are currently under construction. This information has been supplied by LBB's Building Control Department.
- 5.11 There is considerable housing development activity taking place in LBB at present. Table 10 below provides details of those major residential developments (10 or more units) currently under construction.

LPA Reference	Address	No. of Units
01/03055/INC	South Eden Park Road, Beckenham	112
02/01390/INC	Kent County Cricket Ground, Beckenham	42
02/01523/INC	New Farmingham House, Chislehurst	19
02/04514/INC	117 London Road, Bromley	10
03/01431/INC	1 Upper Park Road, Bromley	12
03/01682/DOMFPC	18, The Knoll, Beckenham	13
03/02668/INC	Holwood, Westerham Road, Keston	16
03/03178/INC	Bromley Hospital	188
03/08553/DOMFPK	7 The Avenue, Beckenham	10
04/00956/DOMBNK	86 Westmoreland Road, Bromley	23
04/01128/INC	70 Vinson Close, Orpington	14
04/01203/INC	Orpington Hospital	45
04/01241/INC	Orpington Hospital	49
04/01960/INC	Farnborough Hospital	46
04/02633/INC	Aquila, Golf Road	212
04/03049/DOMFPK	1 -3 Landsdowne Road	12
04/06193/DOMFPK	Broomleigh House, Beckenham	19
04/09036/DOMFPJ	61 Abermarle Road, Beckenham	14
04/09362/DOMBNK	70 The Avenue, Beckenham	12
04/09190/INC	11 St Johns Road, Orpington	20
04/10614/DOMFPK	130 Widmore Road, Bromley	14
03/04415/FULL3	Albemarle House, Beckenham	122
03/02940/FULL1	Holwood	78
Total Number of Units Currently Under Construction		1102

Table 10: Current Residential Developments in LBB

Source: London Borough of Bromley - Building Control - February 2005

- 5.12 Although this list is not necessarily comprehensive and some of these developments may be in phases, this information does give an indication of a significant level of housing activity and investment in this sector. In addition to these developments we found a large number of minor developments currently under construction.

Unimplemented Permissions

- 5.13 In order to further investigate the local housing market and why permissions have not been implemented, we have researched a schedule of unimplemented permissions

between 1999 and 2003 provided by LBB. During these years, as the housing market was particularly buoyant, the non-implementation of permissions could give cause for concern. A full list of unimplemented permissions is included as Appendix H and a list of sites that are under construction is included as Appendix I. We have reviewed this information and a significant proportion of these developments consisted of small sites, below the threshold of 10 units. Many of these could have been sought for valuation purposes or may not be viable. The failure of these permissions to be implemented could be for a number of reasons, but may be a reflection of the lack of strength of the local market for local builders or investors, impacting on viability.

Site Number	Reference Number	Location	No. of units	Date of decision
1	98/03444/FULMAJ	64 Tintagel Rd, Orpington	28	18/03/1999
2	99/01935/FULL3	80-98 Beckenham Rd	15	18/01/2000
3	02/02242/FULL1	79 High St, St. Mary Cray, Orpington	22	14/10/2002
4	02/02055/FULL1	146 High St, Orpington	10	31/10/2002
5	02/01390/FULL1	Tollgate Garage, Chislehurst	14	03/12/2002
6	02/02062/ FULL1	Former RAF married HQ, Main Rd, Biggin Hill	12	03/03/2003
7	02/00134/ FULL1	37 Church Rd	11	27/03/2003
8	03/01528/ FULL1	Land adj. Station Yard, Clockhouse Rd, Beckenham	14	05/06/2003
9	03/01156/ FULL1	53 Hastings Rd, Bromley	27	11/07/2003
10	03/00602/ FULL1	Derwent House, 68 Camden Park Rd, Chislehurst	11	04/08/2003
11	03/02647/ FULL1	130 Widmore Rd, Bromley	14	14/10/2003
12	03/03098/ FULL1	1-3 Lansdowne Rd, Bromley	12	15/12/2003

Table 11: Unimplemented Planning Permissions of over 10 units

Source: London Borough of Bromley

- 5.14 The above table was provided by officers at LBB. We have sought clarification from Officers and, in some cases developers or their agents, as to why these permissions have not been implemented. These are set out below on a site by site basis.

Site number 1 (Tintagel Road)

- 5.15 This development has been superseded by planning permission reference number 02/02736/FULL1, which was granted on the 29th of June 2004 and, therefore, should be deleted from this list.

Site Number 2 (Beckenham Road)

- 5.16 This scheme sought permission for 15 units. Development has commenced on this site as of the 14th of December 2004, and therefore should not apply.

Site number 3 (High Street, Orpington)

- 5.17 This application was approved in 2002 and still has outstanding conditions relating to landscaping, materials, windows and archaeology of which none have been discharged. According to the agent there are commercial reasons as to why this permission has not been developed.

Site number 4 (146 High St, Orpington)

- 5.18 According to the agent this development has not come forward for legal and commercial reasons.

Site number 5 (Tollgate Garage, Chislehurst)

- 5.19 The proposed development at the Tollgate Garage (number 5 above) has been the subject of a new Building Control application which is pending consideration, which suggests that this scheme will be implemented. A Section 106 for the outline application was signed on March 31st 2005.

Site number 6 (Former RAF married HQ, Main Rd, Biggin Hill)

- 5.20 This permission has been superseded by an application for a larger housing development which was supported by Members on the 26th of October 2004, subject to a Section 106 agreement. The S106 Agreement for the outline application was signed on 31/03/05.

Site number 7 (37 Church Rd)

- 5.21 This site is awaiting start of development and Building Control plans have been approved, which suggests implementation is imminent.

Site number 8 (Land adj Station Yard, Clockhouse Rd)

- 5.22 Development at this site was completed on 27th of May 2004.

Site number 9 (53 Hastings Rd, Bromley)

5.23 This development at Hastings Road was shown as completed in October 2004.

Site number 10 (Derwent House, 68 Camden Park Rd, Chislehurst)

5.24 Outstanding conditions on this permission have yet to be discharged. There is thought to be financial viability issues, due to the costs associated with this development in the conservation area in close proximity to a listed building, outweighing potential profits.

Site number 11 (130 Widmore Rd, Bromley)

5.25 Development on this site has commenced and therefore this site should be deleted from this list.

Site number 12 (1-3 Lansdowne Rd, Bromley)

5.26 As site 11.

Comment

5.27 From this information it is evident that the greater proportion of the major sites provided by LBB as being unimplemented should not be considered as such.

5.28 The reasons why the remaining major sites have not been built during this period are, as expected, and include:

- legal reasons (ownership, land acquisition issues)
- commercial reasons (possible failure to secure sufficient funding)
- conservation costs (the presence of a listed building on the site) impacting viability.

5.29 The total number of major development sites not implemented in the period of 1999-2003 equates to 14 units. This is not a significant number of units in an Authority such as LBB.

5.30 In order to consider this matter further, we have taken a sample of the following minor development sites which we reviewed. This is due to the high proportion of such small developments in LBB.

Unimplemented Permissions on Smaller Sites

5.31 The table below is a sample of 5 sites

Site Number	Reference Number	Location	No. of units	Date of decision
1	00/03306/FULL1	149 Beckenham Road	6	31/10/2001
2	01/02360/OUT	Cadet Force Centre, George Lane, Bromley	2	16/1/2002
3	02/04190/FULL1	12A Cranley Parade	2	23/1/2003
4	02/04203/FULL1	7A Cranley Parade	2	23/1/2003
5	03/002044/FULL1	114A Bromley Road , Beckenham	7	27/02/2003

Table 12: Sample of Unimplemented Minor Residential Permissions

Source: London Borough of Bromley

5.32 This small random sample of smaller sites was selected and analysed in order to establish if a similar situation exists with sites with planning permission for less than 10 units.

Site number 1 (149 Beckenham Road)

5.33 The permission on this site has been superseded by planning permission 04/01779/FULL1, which is for 9 units and was decided on 17th August 2004. Development has not yet commenced on this site.

Site number 2 (George Land, Bromley)

5.34 A Building Control application has been submitted for this site. A decision has not yet been reached but development is anticipated in the near future.

Sites 3 and 4 (Cranley Parade)

5.35 Development is due to commence on both of these sites in the near future.

Site number 5 (Bromley Road, Beckenham)

5.36 Development has commenced on this site as of 4th June 2004. This 7 unit development should be completed in the near future.

5.37 It is therefore evident that a similar picture emerges on the smaller sites.

Comment

5.38 From the analysis of both the larger sites and smaller sites it is apparent that the initial impression and concerns over unimplemented permissions is unfounded. Many of these 'unimplemented' permissions are, in fact, under construction and many more have been superseded by other permissions. In fact, our sample demonstrates that a greater number of permissions has been implemented than originally understood.

Housing Price Assessment

5.39 To fully understand local housing dynamics, it is important to consider the cost of property in LBB. This is to seek to determine whether LBB property prices reflect other London Boroughs. Property prices can be used to detect the popularity of a Borough as a location, the demand for property in this location and to determine the strength of the local housing market. If property values are significantly below those of comparative Boroughs, this may give an indication of the attractiveness of this location for property investment.

5.40 The table below shows data from the Proviser website (Crown Copyright), which summarises house prices for each Borough. The house prices quoted are averages for each area, taken from July to September 2004 and give an indication of LBB's position compared to other surrounding London Boroughs and the London and South East averages.

London Borough	Average Price Detached	Average Price Semi Detached	Average Price Terraced	Average Price Flat/Maisonette
Bromley	£495,365	£283,771	£228,037	£175,067
Bexley	£310,914	£225,009	£179,181	£131,890
Croydon	£404,191	£261,926	£204,107	£149,413
Greenwich	£481,140	£258,765	£217,289	£195,058
Lewisham	£420,663	£303,946	£231,443	£160,642
Southwark	£651,194	£422,137	£306,953	£230,404
London	£568,010	£327,446	£301,584	£241,347
South East	£373,195	£214,785	£175,163	£147,898

Table 13: Average House Prices

Source: Proviser Website, accessed on 24/01/05 (Crown Copyright)

5.41 As can be seen from the above table, house prices, from July to September 2004, differ widely from Borough to Borough in South East London, London as a whole and the region of the South East of England. It is also apparent from the table that house prices in LBB, as indicated in Table 14, below, illustrate this point further by comparing the average price of a semi detached house in the various areas. Again, LBB emerges as being mid range.



Table 14: Comparison of Semi Detached House Prices

5.42 From this information, it is evident that LBB is performing adequately in terms of price of property. This suggests that there are no major flaws in the local market, compared with the other London Boroughs in the sample.

Conclusion

5.43 The completion rate in LBB compared with planning permissions in most neighbouring London local authorities is only just below average. This suggests that the issue of the implementation of planning permissions in LBB may not be as serious as identified by the Inspector. This is because many permissions, at first thought to be unimplemented, have either been amended or are under construction. From the information supplied, it is apparent that there are no issues with respect to the pricing of dwellings in LBB, compared with other London Boroughs included in this

assessment and there are significant numbers of dwellings being constructed. This suggests that there is no issue with LBB in terms of a location for property investment, with prices reflecting other London Boroughs in South East London and significant construction activity presently taking place.

- 5.44 From this brief analysis, it is evident that there is significant housing activity in LBB and that the greater proportion of major housing planning permissions is implemented. The local dynamics do not appear to differ from other neighbouring authorities and there is no evidence to give cause for concern.

6.0 ASSESSMENT OF OPEN SPACE

Methodology Used To Assess Housing Sites on MOL, UOS and Other Open Land

- 6.1 In paragraph 8.16.2 of the Inspector's report, reference was made to the need for the LBB to review its open space, as a potential source of housing. In sequential terms, this must follow the allocation of all previously developed land and brown field sites identified in HCS or as part of any other assessment. The next option, in PPG3 terms, is urban extensions. In paragraph 8.16.4 the Inspector states that the lack of suitable housing sites in non-Green Belt or Metropolitan Open Land (MOL) locations may constitute exceptional circumstances for GB / MOL sites to be considered. As part of this assessment, a desk top analysis of MOL, UOS and other open land was undertaken. This process was intended to establish whether any of these sites warranted further analysis as to their potential suitability for additional housing in line with the Inspector's requirements.
- 6.2 All the data and site information used for the analysis was provided by LBB. For completeness this included all the Borough's local parks, woodland areas, sports pitches and other open space. The methodology used to identify potential sites was agreed with LBB prior to the commencement of the analysis.
- 6.3 The planning policy background to this report is described in Section 2. This outlines the main policy and guidance PPG2, PPG17 and the London Plan.

Identification of Potential Sites for Housing Development

- 6.4 Following consultation with LBB, it was agreed that the following sites should not be considered:
- i) Land of less than 0.5 ha in area;
 - ii) Land that has a formal playing pitch use and is used for formal play space; and,
 - iii) Land that included Woodland sites or trees subject to TPO which would require removal for significant development
- 6.5 The reason that sites below 0.5 ha were not considered was to limit the extent of the assessment to meaningful potential housing sites. This approach tallies with LBB's assessment criteria in their sequential analysis prior to the UDP Inquiry.

- 6.6 Formal play space and pitches were dismissed due to the provisions of PPG17 and the desire of the LBB to retain such important provision.
- 6.7 The woodland and TPO sites were considered by the LBB to be inappropriate locations for development. Furthermore, the development of sites with important trees should normally be resisted.
- 6.8 The remaining list of sites to be assessed was produced following a desk-top analysis of LBB's records. As can be seen below, further detailed analysis revealed that some of the identified locations did not meet LBB's assessment, however this was only revealed when these locations were examined in more detail.
- 6.9 A list of sites, discounted at this stage, is attached in Appendix J (1-3) and the remaining sites attached at Appendix K.
- 6.10 These remaining sites were subject to a comprehensive desk top analysis which assessed the potential suitability of the sites against the following criteria:
- A. The location and accessibility of potential development sites to shops and services;
 - B. The accessibility of the site by non-car modes of transport;
 - C. The physical and environmental constraints on development of land including for example, whether the development would adversely affect a SINC or ancient woodland;
 - D. The defensibility of the sites boundaries.
- 6.11 By undertaking this systematic search sequence it was possible to identify a number of potential sites that are situated in close proximity to a good level of public transport services and other local services and facilities. It was considered that sites that performed well at this stage were worthy of more detailed assessment in line with criteria set out in PPG3. The sites taken forward for further analysis are discussed below.

Former Blue Circle Sports Club

- 6.12 This site is considered in more detail in Section 7 (and Part II) of this Report, as the site of the former Blue Circle Sports Club has previously been raised as a potential housing site and has a planning history including a proposal for use for a new secondary school.

Beckenham Green

- 6.13 The site is approximately 0.69 ha and is situated on Albemarle Road, Beckenham. The site was considered appropriate for further analysis as it is well related to local services found in Beckenham Town Centre, located within 800 metres of Beckenham Junction railway station, frequent bus services and tram services, has no physical or environmental constraints and has defensible boundaries. The site is currently designated in the LBB UDP Second Deposit Draft as Urban Open Space.
- 6.14 Following further assessment and a site inspection it was considered that this open space performs an important amenity function within Beckenham Town Centre. This space is clearly well used and has an important role in creating a visual buffer and amenity function and is not considered appropriate for housing.

Betts Park

- 6.15 The site is located adjacent to Croydon Road and is 5.83ha and is currently designated in the LBB UDP Second Deposit Draft as Urban Open Space.
- 6.16 According to records provided by LBB the Park is recognised as a formal park and for outdoor sports use. This area is an attractive local park that is well used and plays an important amenity role for the surrounding residential community. However, due to the good relationship between the site and local services, the close proximity of Anerley railway station, local bus and tram services, the site was considered appropriate for further analysis. The site also has the characteristics of well defined and defensible boundaries.
- 6.17 Following a more detailed analysis, it was concluded that the site is unsuitable for housing development. It is considered to be a mature, well used public open space with a children's playground and sports pitches. This site plays an important role in serving the local community and also has a visual amenity function. In view of this, we do not consider that this site is appropriate for housing development.

Broomhill Common

- 6.18 Located in close proximity to the High Street, the site (0.71 ha) was identified in the desk top study as having moderate access to essential local services and good transport links. The site was also considered to have well established and defined

defensible boundaries. The site is currently designated in the LBB UDP Second Deposit Draft as Urban Open Space and is located within a Conservation Area.

- 6.19 Following a site visit, we concluded that the site plays a valuable role in the residential amenity of the area and was not suitable for housing development. The site also has limitations due to the topography of the land and a number of mature trees located within its boundaries and forms part of the overall character and quality of the Conservation Area.

Husseywell Open Space

- 6.20 Husseywell Open Space, which covers an area of 1.1ha, is designated in the UDP as Urban Open Space. It was assessed due to the sites strong access to local services and the range and frequency of public transport in close proximity. The site is currently designated in the LBB UDP Second Deposit Draft as Urban Open Space.
- 6.21 The site is not considered appropriate for housing development due to the well established characteristics of the site which include a lake and small formal park. The site is a valuable local amenity space and also plays an important buffering role.

Penge Recreation Ground

- 6.22 The 1.49 ha site is located to the south of High Street, Penge and was further assessed as it is well related to both established local services and a range of frequent public transport services connecting to a number of destinations.
- 6.23 The site is currently designated in the UDP Second Deposit Draft as Urban Open Space. It is not appropriate for housing development. The site currently has a playground and informal football pitch within its boundaries in addition to a number of mature trees. The development of the site for housing would lead to the loss of an important local amenity.

Royston Field

- 6.24 Located just off Franklin Road, Royston Field (1.31 ha) enjoys a range of frequent public transport services connecting to a number of destinations and is within 800m of all the essential services identified in the Sustainability Checklist. The site is currently designated in the LBB UDP Second Deposit Draft as Urban Open Space.

6.25 This site performs an important role as Urban Open Space. Two football pitches and a basketball shooting practice area are provided. Due to the presence of playing pitches, Royston Field provides a valuable resource to the local community and is, therefore, not considered appropriate for housing development.

Widmore Open Space

6.26 The site is approximately 1.4 ha and is located on Lewes Road. It was considered appropriate for further analysis as it is well related to local services and is within close proximity to a range of existing public transport services. The site was also judged to have well defined and defensible boundaries. The site is currently designated in the LBB UDP Second Deposit Draft as Urban Open Space.

6.27 Following further assessment the site was considered to be inappropriate as there is well used Children's play equipment and a hard surfaced play area within its boundaries and a number of mature trees, all of which provide valuable local amenity functions.

Summary

6.28 The Inspector required LBB to assess the potential of additional sites to address a shortfall in housing provision.

6.29 As part of this process, she required LBB to undertake a review of its open space provision, with a view to creating an Open Space Strategy. We understand from LBB that the initial phase of this research has been undertaken, but that additional work is required to complete such a strategy. This has not been undertaken, but as part of its review of potential sources of housing, NLP has assessed existing open space, including UOS and MOL.

6.30 Although some of these sites are well located in terms of access to public transport and local facilities, they were all inappropriate for housing development. This is mainly due to their amenity function, either in terms of creating important buffers between built forms, or providing important local facilities for the community.

7.0 ANALYSIS OF SITES

Introduction

- 7.1 The research set out in the preceding sections of this report has concluded that there has been a shortfall in housing provision in LBB. As a result of this under provision it is considered that sites will need to be identified for, in the region of, 2,000 additional units over the period until 2016, unless completion rates increase to the levels predicted by LBB in the Second Deposit Draft Plan.
- 7.2 These results broadly concur with the findings of the Inspector who concluded that there was a deficit of 1000 dwellings in 2001 that will need to be addressed in addition to an annual requirement of 573 dwellings.
- 7.3 In view of the serious implications of the requirement to allocate GB or MOL, in relation to planning policy, a detailed sequential analysis and sustainability appraisal has been undertaken in order to provide a comparative analysis of the potential sites and assist LBB in identifying which sites should be the subject of further consideration. For completeness, and in accordance with the recommendations of the Inspector, this analysis has included all sites of 0.5 hectares or over including those already identified as proposal sites in the UDP, as agreed by LBB.
- 7.4 The remit of this study is not to repeat work that has already been undertaken by LBB, in terms of sequential analysis, but to revisit and review previous work whilst taking into consideration the views expressed by the Inspector in her Interim Report.
- 7.5 This section sets out the general methodology that was used to review the sequential analysis undertaken by LBB. This will include an outline of the approach used to identify the sites that were considered suitable for more detailed assessment.
- 7.6 The methodology used is based upon the principles set out in PPG3 and this approach is reflected in the way that the results are presented in the report. The results are therefore presented in respect of the following; proposal sites, brown field sites, UOS, MOL, and GB.

General Methodology

- 7.7 The methodology for the sequential approach is underpinned by the guidance contained in PPG3. The search sequence is therefore as follows:
- Previously developed land and buildings within urban areas (as identified in the Housing Capacity Study (HCS));
 - Urban extensions in accessible non GB/MOL locations; followed by,
 - Extensions in accessible GB or MOL sites.
- 7.8 For the purposes of the assessment the sites were split into the following:
- Proposal sites (2DD including Pre Inquiry Changes)
 - Brownfield sites
 - Other omission sites (including UOS / GB and MOL)
- 7.9 An initial review of LBB's initial sequential analysis was undertaken in order to ensure that no anomalies could be identified.
- 7.10 Following this, sites that were identified as being worthy of further assessment were then subjected to a more rigorous sequential assessment and sustainability appraisal (this included **all** sites allocated for housing development in the Second Deposit Draft UDP and Pre Inquiry Changes and sites that the Inspector considered should form part of the more detailed comparative analysis).
- 7.11 All of the sites that were subject to the more detailed analysis have been reported with a brief description of the site and its surroundings, site location plan, together with a description of the amount of development that it is considered could be accommodated on the site. Part II of this report contains the summary of the detailed evaluation on each of the sites assessed.
- 7.12 The remaining sites were ruled out for a variety of reasons as they were considered inappropriate for potential allocation for housing development. A schedule containing details of the sites that were considered inappropriate for housing development and the reasons for this decision is attached at Appendix A.
- 7.13 This approach is in accordance with the comments contained in the Inspector's Interim Report. In paragraph 8.16.5 where the Inspector indicates that, in instances where she recommends unequivocally against either GB/MOL boundary

modifications or against the allocation proposed, it is her view that such sites should remain within the GB or MOL. The Inspector therefore considers that, in such cases, there would be little merit in including such sites in the sequential analysis.

7.14 The sites that were considered worthy of further detailed assessment were all visited and assessed in light of the following issues set out in PPG3:

- Whether or not the site is previously developed;
- Location and accessibility characteristics;
- Capacity of existing and potential infrastructure;
- Physical and environmental constraints on the development of the site.

7.15 The methodology used to assess each of the above issues is set out below:

Previously Developed Sites

7.16 Although it is generally straightforward to assess the merits of the site in terms of whether it should be classed as 'previously developed' a small number of sites that were assessed did require more detailed consideration; for example, where the site was formerly used, but has become overgrown. In such circumstances, we have followed the guidance contained in PPG3 (Annex C) and where a greater degree of interpretation has been required, this is set out in the text that accompanies the specific site in question.

Location and Accessibility

7.17 The accessibility of the site, both in terms of its location and physical characteristics and, in terms of its accessibility to employment, shops and services by means of transport other than the private car have been assessed. The proximity of the site to train stations and bus stops and the number and frequency of services has been taken into consideration.

7.18 Public Transport Accessibility Levels (PTALs) have been obtained from Transport for London for all of the sites and their relevance has been evaluated in relation to each site. There are a number of limitations that need to be highlighted in connection with the use of PTALs' particularly when they are applied to a suburban borough such as LBB rather than the inner London Boroughs for which they are, perhaps, better suited. In her Interim Report, the Inspector recognises the shortcomings of PTALs

when applied to a suburban borough such as LBB, indicating that in such areas users of trains, for example, are likely to be prepared to walk further than the walk catchment areas used in the PTAL model to assess indices and values.

- 7.19 It is therefore considered that the PTALs' quoted in the report should be used as a guide only and not as providing a definitive assessment of the public transport accessibility of sites within LBB.
- 7.20 A detailed explanation of the way that PTALs' are calculated and the way that they should be interpreted (produced by TfL) is attached at Appendix L.

Capacity of Existing and Potential Infrastructure

- 7.21 In terms of the capacity of existing and potential infrastructure, the proximity of the following key local services and facilities have been assessed both from visiting the site and surrounding area and by using a range of internet search engines that identify the nearest Doctor's Surgery, Post Office, School, Community Centre and provide approximate distances. A list of the key services and facilities that formed part of the assessment and the relevant internet search engines are attached at Appendix M. It is important to note that this is not intended to be an exhaustive analysis of all relevant facilities that may be available in an area.
- 7.22 The remit of this study does not take account of any proposals by the Council for the provision of new transport infrastructure or of the capacity of existing education establishments and medical facilities. However, this information is available to the Council and the current position with regard to these issues should be taken into consideration by the Council when considering the allocation of new sites for housing.

Physical and Environmental Constraints

- 7.23 Physical and environmental constraints on the development of the land have been identified where these are obvious; for example, change in levels, proximity to electricity substations, overhead power lines or the railway. However, it is important to note that constraints on a site, for example, land contamination, may not always be obvious and may only be identified following a full site investigation.
- 7.24 The ability to 'build communities' (PPG3, paragraph 31) has not been included as part of the assessment as LBB do not consider that it is appropriate to the suburban context in LBB.

7.25 The results of the sequential analysis have been presented in tabular form (Tables 15 -17); this also includes scoring which forms the basis of our sustainability appraisal in Section 8, which may be referred to when considering this appraisal. A more detailed qualitative analysis of the potential of the site, for further consideration by the Council, is attached in the accompanying text contained in Part II of this Report. An overall analysis of the results of the assessments has been set out in detail below.

RESULTS OF REVIEW OF SEQUENTIAL APPRAISAL

TABLE 15 – SEQUENTIAL APPRAISAL - PROPOSAL SITES

Site/Address/ Location	Current Designation	Suggested Use	SEQUENTIAL TEST CRITERIA							
			Prev. Devl. Site? (a)	Defensible GB/MOL Boundary (b)	Total (a + b)* 10	Physical / social Infras. Capacity (c)	Location access by non car modes (see note 1) (d)	Total (c + d)** 10	Physical / Enviro. Constraints.	Comments
Bromley North Station	N/A	Housing/Mixed Use (e.g. car parking)	Yes. a = 5	Yes. b = 5	10	High: Town centre location with accessibility to all essential facilities. c = 5	High: Town centre site adjacent to transport interchange. d = 5	10	Yes. Grade II Listed station building.	Housing would represent an appropriate and efficient use of the site and is identified as Prop. Site 14.
Bromley South Station	N/A	Mixed use.	Yes. a = 5	Yes. b = 5	10	High: Town centre location with accessibility to all essential facilities. c = 5	High: Town centre site situated on a transport interchange. d = 5	10	Yes. Possible vehicular access constraints.	The site is allocated in the 2DD as proposal site 13.
Widmore Road, Old Police station	CA	Mixed use.	Yes. a = 5	Yes. b = 5	10	High: Excellent access to rail (Bromley South and North Stations) and local bus routes. c = 5	High: Town centre site. d = 5	10	Yes. The police station is locally listed and the church building is statutory listed.	It is proposed that the buildings will be retained and reused.
Tweedy Road	N/A	Additional Housing	No. a = 1	Yes. b = 5	6	High: Town centre location with accessibility to all essential facilities. c = 5	High: Close proximity to Bromley North station / transport interchange. d = 5	10	Yes. Tweedy Road to the north and Bromley College to south.	Small narrow site constrained by Tweedy Road to the north and Bromley College to south.

Site/Address/ Location	Current Designation	Suggested Use	SEQUENTIAL TEST CRITERIA							
			Prev. Devl. Site? (a)	Defensible GB/MOL Boundary (b)	Total (a + b)* 6	Physical / social Infras. Capacity (c)	Location access by non car modes (see note 1) (d)	Total (c + d)** 6	Physical / Enviro. Constraints.	Comments
Worsley Bridge Road (2DD)	MOL	Housing.	No. a = 1	Yes. b = 5	6	Moderate: 800m Beckenham High St; adjoining primary school c = 3	Moderate / Low: 800m to New Beckenham/ Beckenham Junction stations. d = 3	6	None.	Land forms part of school playing field/grounds. Site overlooked by residential development to the east. Forms part of MOL area to the west. Previous applications related to school use.
Land off Goddard Rd, Elmers End	UOS	Housing 2DD, affordable and expansion of industry.	No. Allotment a = 1	Yes. b = 3	4	High: adjacent to Prim. Sch. And within 800m of all essential services. c = 5	High: Elmers End stat, regular bus service and a tram stop within 5 – 10 mins walk. d = 5	10	Yes. Potential flood risk and possible contamination from former industrial use.	Western edges of site are closely bordered by industrial units. Planning application for 22 units permitted on 23/03/05.
Ravensbourne College	MOL	Housing.	Partial. a = 3	Yes. Site is edge of centre but not projecting. b = 3	6	Low: Elmstead stat 1km from site. Limited bus service along Elmstead Lane. c = 1	Moderate: The Majority of local services are found to the east along Chislehurst High Street. d = 3	4	Yes. The Green Chain Walk runs along the northern boundary of the site. The existing woodland to the east of the site is protected by a TPO and the site contains telecommunications apparatus.	There is currently an outline application under consideration (ref: 04/04047/OUT) for the demolition of the existing college building and students residential accommodation and the erection of approximately 251 dwellings.

Table 15: Sequential Appraisal - Proposal Sites

TABLE 16 – SEQUENTIAL APPRAISAL - BROWNFIELD SITES

Site/Address/ Location	Current Designation	Suggested Use	SEQUENTIAL TEST CRITERIA							
			Prev. Devl. Site? (a)	Defensible GB/MOL Boundary (b)	Total (a + b)*	Physical / social Infras. Capacity (c)	Location access by non car modes (see note 1) (d)	Total (c + d)**	Physical / Enviro. Constraints.	Comments
Clock House Station, Land Adj, Beckenham	-	Housing	Yes. a = 5	n/a b = 5	10	Moderate: Beckenham / Penge High Sts/local shops; primary school c = 5	Moderate: adjoining Clock House Station d = 5	10	Yes. Access, adjoining business site, local flooding rail noise	Derelict sites, dumping. Any scheme would need to improve access to station. Relationship with adjoining site – where current application for redevelopment to residential.
St Mary Cray Station, St Mary Cray. Land Adj.	-	Housing	Yes a = 5	n/a b = 5	10	Moderate: Adjoining local shops; primary schools c = 3	Moderate: Adjoining St Mary Cray Station. d = 5	8	Yes. Access, levels rail noise	Land potentially contaminated.
Chelsfield Station, Chelsfield. Land Adj	-	Housing	Yes. a = 5	n/a b = 5	10	Moderate: Windsor Drive shops, primary school c = 5	Moderate: Adjacent Chelsfield Strn. d = 5	10	Yes. Site configuration, access, rail noise.	Site constrained by small size. Very close station platform. Loss of station parking where there is no alternative facility. Back to site slopes steeply.
Bickley Station, Bickley, Land Adj	-	Housing	Yes. a = 5	n/a b = 5	10	Moderate/Low: schools, but 1km from shops c = 1	Moderate: Adjoins Bickley Station d = 5	6	Yes. Site configuration access, rail noise	Planning history: applications for various business uses and coach parking.

Table 16: Sequential Appraisal - Brownfield Sites

* - Site Prioritisation total ** - Site Appraisal total

TABLE 17 – SEQUENTIAL APPRAISAL - URBAN OPEN SPACE, METROPOLITAN OPEN SPACE, GREEN BELT

Site/Address/ Location	Current Designation	Suggested Use	SEQUENTIAL TEST CRITERIA							Comments
			Prev. Devl. Site? (a)	Defensible GB/MOL Boundary (b)	Total (a + b)*	Physical / social Infras. Capacity (c)	Location access by non car modes (see note 1) (d)	Total (c + d)**	Physical / Enviro. Constraints.	
Oakley Road/Gravel Road, Bromley Allotment Land between	UOS	Housing	No. a = 1	Yes. b = 5	6	Low: c = 1	Low: d = 1	2	None known.	Partly used allotment land.
Pickhurst Green Hayes (Land adjacent)	UOS	Housing	No. a = 1	No. b = 3	4	Moderate: Close to schools/local shops at Station Approach Hayes c = 3	Low: Hayes Station 0.9km, limited range of bus services to Bromley, Catford, Biggin Hill & Westerham. d = 1	4	Yes. Access, Proximity to pond / drainage.	Site bordered by pond and drains, forms part of tree belt along edge of UOS.
Land off Bushell Way, Chislehurst (1DD)	MOL (removed 1DD)	Housing 1DD	No. a = 1	Yes. b = 3	4	Moderate: Library, College, School, Rec ground with close proximity. c = 3	Moderate / Low: This site is in close proximity to Chislehurst High Street which has regular and frequent bus services. d = 3	6	Yes. Electricity Sub Station, The Green Chain Walk to the south and possible site contamination.	Site not allocated in 2DD as Council considered unnecessary.
91-117 Copers Cope Road, Land r/o, Beckenham (see note 2)	MOL	Housing	No. a = 1	Yes. b = 3	4	Moderate: 1km Beckenham, but schools closer c = 1	Moderate: Close to New Beckenham Stn d = 5	6	Yes. Access, TPO on part of site residential amenity (backland).	Site includes features of interest from previous use. Western boundary abuts railway line.

Site/Address/ Location	Current Designation	Suggested Use	SEQUENTIAL TEST CRITERIA							
			Prev. Devl. Site? (a)	Defensible GB/MOL Boundary (b)	Total (a + b)*	Physical / social Infras. Capacity (c)	Location access by non car modes (see note 1) (d)	Total (c + d)**	Physical / Enviro. Constraints.	Comments
Blue Circle Site (Bromley Common)	GB	Housing affordable housing, allotments, play, landscaping / open space	No. a = 1	Yes. b = 5	6	Low: Chatterton Rd/South-borough Lane shops; schools c = 3	Moderate: d = 3	6	Yes. Some possible site contamination.	See report to DCC 29 January 2002.
The Drift, Croydon Road, Keston, (Land at see note 2)	GB	Housing	No. a = 1	No, without including adjoining school, housing nursery b = 3	4	Low: Adjoining secondary school. c = 1	Low: d = 1	2	No obvious constraints.	This is a greenfield site currently comprising of a mixture of grassland and scrubland.
Land adjacent to Warren Road, Chelsfield	GB	Housing	No. a = 1	No. b = 1	2	Moderate: With 800m of all essential services. c = 3	Moderate/High: Large site. Southern part of site better served. d = 3	6	None known.	The site is currently in agricultural use.
Juniper Close, Aperfield Road Biggin Hill. Land off	GB	Housing	No. a = 1	No. b = 1	2	Moderate: Main Rd shops 800m schools. c = 3	Moderate / Low: d = 1	4	Yes. Access, residential amenity (backland).	This Greenfield site is currently being used for the grazing of horses.
Cockmannings Lane, Opington. Land at	GB	Housing	No. a = 1	No. urban extension. b = 1	2	Low: Remote from shops schools 1km c = 3	Low: Three bus routes within a two minute walk. d = 1	4	None known.	No planning history.

Site/Address/ Location	Current Designation	Suggested Use	SEQUENTIAL TEST CRITERIA							
			Prev. Devl. Site? (a)	Defensible GB/MOL Boundary (b)	Total (a + b)* 2	Physical / social Infras. Capacity (c)	Location access by non car modes (see note 1) (d)	Total (c + d)** 2	Physical / Enviro. Constraints.	Comments
Blackbrook Lane, Bickley Land at	GB	Housing	See comm. a = 1	No. b = 1	2	Moderate: Southborough Lane shops 1km schools nearby. c = 1	Low: Chislehurst Station 1km. d = 1	2	Yes. TPO along the site boundary.	Open space including wooded area. Site returned to Green Belt 1964.
Cockmannings Farm, Cockman-nings Road, Orpington	GB	Housing	Part a = 1	No. urban extension. b = 1	2	Low: Remote from shops schools 1km c = 1	Low: d = 1	2	None known.	Cockmannings Farm has history of applications for some B1 uses and residential conversions.

Table 17: Sequential Appraisal - Urban Open Space, Metropolitan Open Space, Greenbelt

Results

7.26 Of the sites that were identified during the initial desk top analysis as being of sufficient merit to warrant further assessment, and that were subsequently subjected to a more detailed sequential appraisal, the results pertaining to the following categories of land are set out below:

- Proposal Sites;
- Brownfield sites;
- Urban Open Space;
- Metropolitan Open Land;
- Green Belt.

Proposal Sites

7.27 All of the sites that have been proposed for housing development in the First and Second Deposit Drafts of the Bromley UDP have been assessed in order to ensure that these sites represent both sequentially preferable and sustainable allocations. This approach will also enable a clear comparison to be drawn between the allocated sites and those that have, hitherto, been rejected by LBB and / or dismissed by the Inspector.

7.28 The results of the assessment of the proposal sites are set out in tabular form in Table 15. The results of the re-evaluation of the sequential appraisal undertaken by LBB during the review of the UDP demonstrate that LBB have identified what are considered to be the most sequentially preferable sites for allocation.

7.29 In terms of their status the following sites all represent brown field sites within the town centre:

- Bromley North Station;
- Bromley South Station;
- Widmore Road, Old Police Station;

7.30 The site at Tweedy Road, although not previously developed, is within the urban area (performs well in terms of the sequential criteria) and, therefore, is considered suitable.

- 7.31 The allocation of the land at Goddard Road, which is designated as UOS, represents an urban extension in an accessible non GB/MOL location and is therefore considered to follow the search sequence set out in PPG3.
- 7.32 The site at Worsley Bridge Road, although designated as MOL, is considered capable of providing a defensible boundary to ensure that the development of the site would not increase pressure for further encroachment into the remaining MOL. The site is also considered to enjoy moderate accessibility to public transport services and local services and facilities. In addition, there are no constraints to the development of the site, which would help to ensure that the housing provision proposed is deliverable. The allocation of this site is considered to be justified as it is considered that no alternatives exist that demonstrate equal merits in terms of the accessibility to public transport and local services and facilities. This compares favourably to other GB, MOL and UOS sites considered.

Ravensbourne College



P 1: Car park to the south of the site



P 2: College Buildings



P 3: View of Grounds

- 7.33 Ravensbourne College is a previously developed site located outside the urban area within MOL and as such it does not therefore figure in the search sequence as defined by paragraph 30 of PPG3.
- 7.34 However, there were representations to the UDP Inquiry and a recent planning application. At the UDP Inquiry, the Inspector considered that the site should no longer remain as MOL, but also concluded that the site should not be designated as UOS.
- 7.35 She dismissed proposals to retain the MOL designation and proposals to designate it as a Major Developed Site (MDS).
- 7.36 A planning application has been submitted for 251 dwellings on the site, with the College re-locating to central London.

Brownfield Sites

- 7.37 During the review of the UDP objections were submitted by Railtrack PLC on the omission of a number of sites that are located in close proximity to a number of stations. As a result, these four sites were considered by LBB and the Inspector, in her Interim Report, and have been included in the review of the sequential appraisal undertaken by LBB. These four station sites represent the only brown field sites that were part of LBB's sequential appraisal and no other suitable brown field sites have been identified.
- 7.38 Although these sites generally perform well in the sequential analysis due to their proximity to public transport facilities and other local services and facilities, there are significant constraints to their development both in terms of their size, potential contamination and their proximity to the adjacent rail related uses.
- 7.39 Of the four brown field omission sites identified, land at Clockhouse Station, is considered to represent the most realistic prospect of redevelopment. The site is currently derelict, but offers the potential for development subject to suitable improvements to the exit from Clockhouse Station.
- 7.40 The remaining sites, set out below, all have significant constraints to their development potential:
- Land Adjacent to St Mary Cray Station;
 - Land Adjacent to Chelsfield Station; and,
 - Land Adjacent to Bickley Station
- 7.41 The development of the remaining sites would result in the loss of areas of car parking that serve the existing station sites and that would need to be provided elsewhere. The availability of land for replacement parking provision is severely limited and renders the possibility of the development of these sites quite remote. In the case of land adjacent to Bickley Station, the development of the site is also constrained by the presence of telecommunications equipment, and further consideration would need to be given to whether this obstacle can be overcome.

Urban Open Space

- 7.42 Following the initial desktop assessment which involved a re-evaluation of LBB's appraisal work, the Inspector's comments, and our own detailed assessment of the

merits of each site, a number of sites were identified as being worthy of further detailed assessment. Of the sites identified as requiring further detailed assessment only two fall within the category of UOS:

- Land between Oakley Road and Gravel Road;
- Land adjacent to Pickhurst Green.

Land at Oakley Road / Gravel Road



P4: Former Allotments



P5: View Northwards

7.43 Land between Oakley Road and Gravel Road which comprises of partly used allotment land is considered to have the potential for housing development should it be required by LBB in order to contribute towards the shortfall identified in housing provision for the period.

7.44 It is acknowledged that, although the accessibility of the site and the level of local services and facilities within walking distance is limited, the site area proposed for development will generate a defensible and enduring boundary. The site is adjacent to an existing residential area and is bounded to the east and west by Oakley Road and Gravel Road, respectively, and to the north and south by existing housing sites. The site is currently under used and abandoned paraphernalia associated with its former use remains. Although designated as UOS it is not considered that the allocation of the site for housing would be significantly detrimental to the amenities of the area.

Land Adjacent to Pickhurst Green

7.45 The remaining UOS site, on land adjacent to Pickhurst Green, is small in nature (410 sq m) and not considered suitable for housing provision due to a combination of factors including the poor level of access to the site, presence of TPOs and a pond adjacent to the site.

Metropolitan Open Land

7.46 Of the sites assessed, the following sites located within MOL are considered to have potential to be considered for housing development:

- Land off Bushell Way, Chislehurst;
- 91-117 Copers Cope Road, Beckenham

Land at Bushell Way



P6: Northern Periphery of Site



P7: Former Electricity Sub Station

7.47 Land at Bushell Way was considered by LBB to be suitable for allocation in the First Deposit Draft of the Plan but was subsequently deleted due the fact that LBB considered that there was no requirement for additional allocations and that sufficient supply had already been identified for the Plan period.

7.48 It is considered that the site area put forward by the objector at the UDP Inquiry (confirmed in Part II of this Report) including the scrubland adjacent to the existing residential development but not the established tree planting or public open space, will result in the creation of a new boundary that will be both defensible and enduring and will not increase pressure for further encroachment into the MOL in the future.

7.49 In view of the characteristics of the site and the moderate levels of accessibility to public transport services and local services and facilities, we consider that the site is capable of development for housing and therefore the site is considered worthy of further consideration by LBB. This should be with a view towards contributing towards the identified shortfall in housing provision for the period.

7.50 The designation of this site and the Inspector's comments regarding the removal of Ravensbourne College (para. 7.33 – 7.36), leave only a small area of MOL, which would fail to meet the strategic requirements of this designation. Therefore a 'tidying up' exercise is required for the purposes of the Proposals Map and to ensure that

land is not unnecessarily designated for MOL. It is important that the Public Open Space and tree planting areas are protected from development. These sections of land also have some remaining strategic importance, between areas of built form. We therefore recommend that the remaining area (in particular the established trees and public park) are protected by way of an Urban Open Space designation.

Land to the rear of 91-117 Copers Cope Road



P8: Land to Rear of 91-117 Copers Cope Rd



P9: View westwards

- 7.51 Despite the ‘backland’ nature of the land to the rear of 91-117 Copers Cope Road, the area of the site put forward by the objector at the UDP Inquiry is considered to represent a logical extension to an existing residential area and will result in the creation of a defensible boundary. In addition, the existence of protected trees on the northern part of the site will assist in providing additional screening to the adjoining sports ground.
- 7.52 The objector has demonstrated that measures have already been taken to ensure that the existing access constraints to the site can be overcome via the provision of a new access from Copers Cope Road to service the development.
- 7.53 We consider that the proximity of the site to New Beckenham Station provides better accessibility levels than are reflected in the PTAL ratings produced by TfL. The majority of local services and facilities, with the exception of schools, are located 1km away. The existence of a group TPO on the site also represents a constraint to development, but the objector has proposed to protect this area within their scheme. The site is worthy of further consideration by LBB as a source of additional housing capacity to contribute towards the shortfall identified within the Plan period.

Green Belt Sites

- 7.54 Following a thorough appraisal of all of the omission sites located within the GB, it is considered that the only Green Belt site that is considered worthy of further

consideration by the Council for allocation for housing is the site of the former Blue Circle Sports Ground at Bromley Common.

Blue Circle



P10: Southern Periphery



P11: Derelict Pavilion (northern boundary)

- 7.55 Although the site is not previously developed, a number of derelict structures including the burnt out shell of the former sports pavilion and smaller buildings associated with the allotments on the eastern side remain. Parts of the site also comprise of hard standing, including areas that were formerly used for the Sunday Market.
- 7.56 In addition to being in a good transport corridor, the site enjoys good access to a range of local services and facilities and is capable of establishing a defensible boundary that will prevent further encroachment onto GB land.
- 7.57 We concur with the view of the Inspector, in her Interim report on the Local Plan Inquiry, that the merits of the site should be re-assessed taking into consideration the identified shortfall in the level of housing provision. The Inquiry Inspector points out that at the time of the Inquiry into the development of the site for a mixed use development (which was subsequently dismissed) the Inspector's decision was not based upon the sort of comprehensive evidence that is associated with a UDP Inquiry.
- 7.58 We consider that the stated combination of the shortfall of suitable housing sites with the lack of sufficient alternative and sequentially preferable sites that are not designated as GB, warrants reconsideration of GB sites such as the Blue Circle site for allocation for housing by LBB. Of the GB sites assessed, the Blue Circle site demonstrates the highest level of accessibility and proximity to local services.

7.59 A more detailed analysis of the merits of the Blue Circle site are provided in the summary contained in Part II of this report.

7.60 Of the remaining sites assessed in detail, the following site is considered to perform an important strategic function in terms of separating settlements and should therefore not be the subject of further consideration by the Council for allocation for housing unless sufficient housing provision cannot be identified on more sequentially preferable sites:

- The Drift, Croydon Road, Keston;

7.61 It is considered that although the following sites would represent extensions to existing residential areas, these are located on the edge of the existing settlements, projecting into the countryside and would therefore result in a significant incursion into the GB, and / or result in the creation of an indefensible boundary. These sites are therefore considered only to warrant further consideration by LBB if adequate housing provision to meet the identified shortfall cannot be identified on more sequentially preferable sites.

- Land to the Rear of Juniper Close and Aperfield Way, Biggin Hill
- Land adjacent to Warren Road, Chelsfield.

7.62 The sites assessed at Cockmannings Lane and Cockmannings Farm demonstrate low levels of accessibility to both public transport and local services and facilities. As a result the sites perform poorly in the sequential appraisal which, in turn, indicates that these sites are unlikely to be sustainable.

7.63 As indicated previously the remaining sites were eliminated from the assessment following the initial desk top assessment for the reasons stated.

Conclusions

7.64 The results of this sequential analysis has identified additional housing sites to be considered in more detail. It also supports the proposal sites designated by LBB. It enables the dismissal of a number of sites which do not display the appropriate locational qualities. This enables a sustainable appraisal of sites that we consider to display sufficient characteristics, in policy terms, to justify further detailed analysis.

8.0 SUSTAINABILITY APPRAISAL

- 8.1 In order to enable a direct comparison to be made between the merits of different sites for housing development, a sustainability appraisal has been undertaken in accordance with LBB's requirements.
- 8.2 The purpose of this appraisal was to undertake a systematic analysis of each of the sites using a clear and robust methodology. The methodology used has been developed to enable a detailed evaluation of the identified characteristics which will, in turn, identify the relative sustainability of the various sites.
- 8.3 The methodology for the sustainability appraisal has been adapted from an approach that was initially developed by Barnsley Metropolitan Borough Council during the review of the Barnsley Unitary Development Plan and subsequently further developed to provide a sequential approach to determining planning applications for residential development, contained in Planning Advice Note 30 (PAN30) and the Council's Sustainability Checklist (Annex 3).
- 8.4 In terms of the robustness of this approach, Barnsley's PAN30 has been the subject of public and stakeholder consultation and we understand from officers that the principle of the approach has been successfully tested at a number of recent appeal inquiries.

Methodology

- 8.5 The sustainability appraisal has been applied to all sites of 0.5 hectares or over that were identified as warranting further analysis in terms of their potential for the allocation for housing.
- 8.6 The appraisal has been divided into 2 sections; 'Site Prioritisation', and 'Site Appraisal' and a scoring system is used to provide a more comparative analysis.

Site Prioritisation

- 8.7 'Site Prioritisation' produces a scoring based upon two factors, first, the nature of the land in terms of whether it is previously developed, and secondly whether the development of the site will result in a defensible boundary.

- 8.8 For each of the criteria to be assessed there are a number of possible answers for example for 'previously developed land' the following answers correspond to the relevant score (as set out on Section 1 of the Sustainability Checklist (Appendix B)):
- a) previously developed land (which would result in a top score of 5);
 - b) a mixture of greenfield and brown field (score 3);
 - c) less than 70% brown field; (score 1).
- 8.9 The site prioritisation score therefore provides an assessment of the priority of the site for redevelopment increasing the weighting against the development of greenfield sites in accordance with the guidance contained in PPG3.
- 8.10 A site with an extremely low site prioritisation score is unlikely to be able to demonstrate through the examination of local services that it is sustainably located. However, in certain circumstances this may not preclude the development of such sites, subject to LBB being able to secure suitable improvements to either public transport or local services.

Site Appraisal

- 8.11 'Site Appraisal' produces a scoring based upon a combination of an assessment of local services and transport accessibility by non car modes. The 'Site Appraisal' score, therefore, reflects the sustainability of the site in terms of the accessibility of public services.
- 8.12 In this way, the 'Site Prioritisation' and 'Site Appraisal' scores for the sites can be identified and the sustainability of a site can, therefore, be assessed and compared with the scores achieved by other sites
- 8.13 For ease of reference and to avoid unnecessary repetition, as the methodology used for the sustainability appraisal is directly related to the sequential assessment, the results have been integrated into the existing tables.
- 8.14 The results of the scoring can be interpreted as set out in Table 18 (below) which demonstrates the relationship between the 'Site Prioritisation' and 'Site Appraisal Scores'. The table shows that a site with an extremely poor site prioritisation score is unlikely to be able to demonstrate through the assessment of local services and facilities that it is sustainably located.

Score		Significance
Site Prioritisation	Site Appraisal	
8 or more	4 or less	Unsustainable Location
	5 or more	Sustainable Location
4 to 7	5 or less	Unsustainable Location
	6 or more	Sustainable Location
2 or less	7 or less	Unsustainable location
	8 or more	Unsustainable – Even a very high site appraisal score may not override the very low site prioritisation score *

Table 18: Interpreting Sustainability Scoring

8.15 The sustainability assessment has enabled a more detailed comparative analysis of the suitability of the sites for allocation for housing to be undertaken, and facilitated the ranking of the sites in the order of their ability to meet sustainable criteria as follows:

- Level 1 - Sites that are considered sequentially preferable and sustainable locations for allocation for housing.
- Level 2 - Sites that demonstrate some sustainable characteristics which the Council should consider for the allocation of housing.
- Level 3 - Sites that are considered to be unsustainable and should not be allocated for housing.

8.16 The results of the sustainability appraisal are set out in Table 19, which includes our conclusions on which 'Level', using the above criteria, these sites should fall into. The results contained in the table are discussed in more detail below.

Site	Designation	Prioritisation Score	Site Appraisal	Level	Comments
Bromley North Station (Proposal Site 14)	N/A	10	10	1	Constraints: Listed Building
Bromley south Station (Proposal Site 13)	N/A	10	10	1	
Widmore Road, Old Police station (Proposal Site 16)	CA	10	10	1	Constraints: Listed Building and building on Local List
Tweedy Road (Proposal Site 11)	N/A	6	10	1	
Worsley Bridge Road (2DD) (Proposal Site 5a)	MOL	6	6	1	
Land off Goddard Rd, Elmers End (Proposal Site 3)	UOS	4	10	1	
Ravensbourne College (Omission Site 57)	MOL	6	4	1	
Clock House Station, Land Adj, Beckenham	N/A	10	10	*	Constraints: railway Small
Chelsfield Station, Chelsfield. Land Adj	N/A	10	10	*	Constraints: railway Small
St Mary Cray Station, St Mary Cray. Land Adj.	N/A	10	8	*	Constraints: railway Small
Bickley				*	Constraints: railway

Site	Designation	Prioritisation Score	Site Appraisal	Level	Comments
Station, Bickley, Land Adj	N/A	10	6		Small
Oakley Road/Gravel Road, Bromley Allotment Land between	UOS	6	2	2	
Pickhurst Green Hayes (Land adjacent)	UOS	4	4	*	Constraints: Small, Pond, TPO
Land off Bushell Way, Chislehurst (1DD)	MOL	4	6	2	
91-117 Copers Cope Road, Land r/o, Beckenham (see note 2)	MOL	4	6	2	TPO
Blue Circle Site (Bromley Common)	GB	6	6	2	GB
The Drift, Croydon Road, Keston, (Land at see note 2)	GB	4	2	3	
Land Adjacent to Warren Road, Chelsfield	GB	2	6	3	
Juniper Close, Aperfield Road Biggin Hill. Land off	GB	2	4	3	
Cockmannings Lane, Opington. Land at	GB	2	4	3	
Cockmannings Farm, Cockmannings Road, Orpington	GB	2	2	3	
Blackbrook Lane, Bickley Land at	GB	2	2	3	

Table 19: Results of Sustainability Appraisal

* 'anomalies' discussed in more detail below.

Proposal Sites

8.17 The results of the sustainability appraisal demonstrate that the approach that LBB has adopted to the allocation of sites within the review of the Bromley UDP does accord

with the guidance set out in PPG3 and represents a robust and sustainable approach to the allocation of housing sites.

- 8.18 This is demonstrated by the comparative scorings that the proposal sites have received in terms of their 'Site Prioritisation' and 'Site Appraisal'. All of the proposal sites identified by the Council score higher in terms of 'Site Priority' than all of the remaining sites that were assessed using this methodology apart from Land at Goddard Road, Elmers End (and a number of anomalies that are discussed in paragraph 8.29).
- 8.19 In terms of the site at Goddard Road, although the sustainability appraisal demonstrates that this site is less sustainable, it is designated as UOS and is therefore sequentially preferable when compared to the only other site to achieve a similar 'Site Prioritisation Score', the Blue Circle site which is located within the GB.
- 8.20 It is evident that there remains a shortage of brown field development sites to meet any shortfall. However, from our assessment, it is evident that there are alternative sites which do not perform their functions as UOS, MOL or GB.
- 8.21 It is clear that the list of proposal sites does follow the PPG3 search sequence. Further discussion of the merits of each of the proposal sites is set out in more detail in Part II of this report.
- 8.22 All of these sites are identified in Table 19 as falling within Level 1 (i.e. sites that are considered sequentially preferable and sustainable locations for allocation for housing).

Urban Open Space

- 8.23 In sustainability terms the site at Oakley Road does not perform particularly well, however in terms of 'Site Prioritisation' it performs as well as all, but one, of the sites considered within Level 2. This site has been included within Level 2 as it is considered to be sequentially preferable when compared to the prospect of further encroachment into GB or MOL.

Metropolitan Open Land

- 8.24 In terms of MOL, Land at Bushell Way, Chislehurst and 91-117 Copers Cope Road, Beckenham are considered to score equally well in terms of both 'Site Prioritisation'

and 'Site Appraisal'. Both sites have their respective constraints. The site at Bushell Way, which was put forward by LBB in the 1st Deposit Draft Plan, is subject to a change in levels, potential contamination and the presence of a disused electrical sub-station, whilst the site at 91-117 Copers Cope Road suffers from access difficulties, potential noise related issues resulting from the railway and the presence of trees subject to a group TPO on the site. Using the sustainability appraisal both of these sites are considered to be sustainable locations for the development of housing.

Green Belt

- 8.25 Of the GB sites assessed, only one site, Blue Circle, has a 'Site Prioritisation Score' that is within the category considered to be sustainable. The 'Site Appraisal Score' also indicates that the site would represent a sustainable location for the development of housing. In terms of sustainability this site performs significantly better than all other GB sites.
- 8.26 The Drift, Keston, scores poorly in terms of both 'Site Prioritisation' and 'Site Appraisal' and falls below the level in terms of sustainability that is considered appropriate for the site to be subject to further consideration for allocation for housing development to meet the required shortfall within this the plan period.
- 8.27 The remaining sites score very poorly in terms of 'Site Prioritisation' where a maximum score of 2 was achieved. Such sites are considered to fall within 'Level 3' and they are therefore considered to be unsustainable and unsuitable to be allocated for housing development for the foreseeable future.
- 8.28 It is important to note that there are limitations associated with this approach and the results of the analysis are based upon a combination of factual evidence and interpretation of the key issues. It is acknowledged that a shortcoming of the methodology is its failure to account adequately for the differences that may occur across the larger sites. In the case of Warren Road, for example, the large size of the sites means that accessibility to public transport and local services and facilities can vary from one end of the site to another. In view of the discouragement placed by central government advice and the London Plan (included in Section 2 of this report), it would not be desirable to allocate large areas of GB or MOL for housing development, in such cases, a cautious approach has been adopted and the lower score used for the purposes of the assessment.

Anomalies

8.29 The sites marked with a * in the table represent anomalies. These are particularly small sites or sites where significant constraints to the development of the site exist. These sites have therefore not been given a score in the final sustainability appraisal. It is also considered that such sites, should they come forward for development, would generally form part of the windfall allowance within the UDP rather than being allocated within the UDP.

Conclusions

8.30 The results of the sustainability appraisal demonstrate that the sites that have been allocated for housing by LBB in the review of the Local Plan are the most sequentially preferable and sustainable of the sites identified as having potential for development within the Borough.

8.31 A combination of the re-evaluation of the sequential analysis and the sustainability appraisal suggests that, in terms of priority, the sites that LBB should reconsider in order to address the shortfall of housing provision within the Borough for the Plan period are as follows:

- Oakley Road/Gravel Road, Bromley (OMX);
- Land off Bushell Way, Chislehurst (OMX);
- 91-117 Copers Cope Road (OMX);
- Blue Circle Site, Bromley Common (OMX)

8.32 These sites are in no order of sustainability, but should all be considered in terms of their site specific circumstances, including deliverability, to meet any housing shortfall.

9.0 HOUSING DENSITIES REVIEW

Introduction

- 9.1 The density of housing development is of key importance to the consideration of housing supply and provision and this is reflected in policy at all levels.
- 9.2 PPG3 requires the inefficient use of land to be avoided, promoting development between 30 and 50 dwellings per hectare, whilst respecting the character of the locality. This advice also emphasises the importance of a greater intensity of development at places with good public transport accessibility and in close proximity to local services.
- 9.3 Linked to the requirement to make best use of land, LPAs should not impose unreasonably high car parking standards and should be willing to consider schemes for car free housing where public transport is available, particularly in urban areas. PPG3 recommends an average parking standard of 1.5 car parking spaces per dwelling.
- 9.4 The requirement to make best use of residential development opportunities also leads to the need for high quality design solutions to achieve densities which are desirable in light of the guidance contained in PPG3 and the London Plan and to ensure that a strong sense of place is created. There is an increasing number of examples of high density developments which display strong, enduring designs.
- 9.5 These high quality high density schemes have already been provided within LBB. Examples of these include developments at Bromley Hospital (124 flats and 64 houses), Bromley House, North Street, Bromley (24 flats), 13 Copers Cope Road, Beckenham (15 flats) and land between Wayside and 4 Kelsey Square, Beckenham (14 houses and 1 flat). These developments should be utilised as a benchmark for future schemes, demonstrating that good quality, higher density developments can be achieved in LBB.



P12: Bromley Hospital, Cromwell Ave, Bromley



P13: Bromley Hospital, Cromwell Ave, Bromley



P14: Bromley Hospital, Cromwell Ave, Bromley



P15: Bromley Hospital, Cromwell Ave, Bromley



P16: 13 Copers Cope Road, Beckenham



P17 and P18: Land between Wayside and 4 Kelsey Square, Beckenham

9.6 The London Plan seeks higher density development in sites of good accessibility to local services and public transport. Included below as Table 20 is the London Plan Density Location and Parking Matrix:

table 4B.1 Density location and parking matrix (habitable rooms and dwellings per hectare)

		Car parking provision	High 2 – 1.5 spaces per unit	Moderate 1.5 – 1 space per unit	Low Less than 1 space per unit
		Predominant housing type	Detached and linked houses	Terraced houses & flats	Mostly flats
Location	Accessibility Index	Setting			
Sites within 10 mins walking distance of a town centre	6 to 4	Central	650 – 1100 hr/ha 240 – 435 u/ha Ave. 2.7hr/u		
		Urban	200 – 450 hr/ha 55 – 175 u/ha Ave. 3.1hr/u	450 – 700 hr/h 165 – 275 u/ha Ave. 3.0hr/u	
		Suburban	200 – 300 hr/ha 50 – 110 u/ha Ave. 3.7hr/u	250 – 350 hr/ha 80 – 120 u/ha Ave. 3.0hr/u	
Sites along transport corridors & sites close to a town centre	3 to 2	Urban	200 – 300 hr/ha 50 – 110 u/ha Ave. 3.7hr/u	300 – 450 hr/ha 100 – 150 u/ha Ave. 3.0hr/u	
		Suburban	150 – 200 hr/ha 30 – 65 u/ha Ave. 4.4hr/u	200 – 250hr/ha 50 – 80 u/ha Ave. 3.8hr/u	
Currently remote sites	2 to 1	Suburban	150 – 200 hr/ha 30 – 50 u/ha Ave. 4.6hr/u		

source GLA

Table 20: London Plan Density Matrix

9.7 These standards may not always be achievable but give an indication of the level of density that is required to ensure the potential of development sites is effectively utilised. This in turn helps to reduce the likelihood of Green Belt and Metropolitan Open Land sites being developed. These standards must be considered as part of the analysis of the housing strategy for LBB. It is essential that LBB embrace these higher density standards, whilst recognising its predominant suburban characteristics.

9.8 LBB’s policies in the draft UDP also seek to ensure higher densities in accessible locations. Policy H7 relates to areas that are within town centres or locations with ‘no readily identifiable character’. It recommends that within areas of high accessibility (referring to Policy T1), the target density is 250 habitable rooms per hectare (hr/ha), moderate areas 175 hr/ha and low 145 hr/ha. It is noted that these were reduced

from the higher densities proposed in the 1st Deposit Draft Plan and the Inspector did not support this policy in her report.

- 9.9 From the information supplied by LBB on housing capacities on the proposal and other potential housing sites, we consider that there is scope to strive for increased densities, closer to the provisions of the London Plan. This, however, enables better use to be made of urban development opportunities. The London Plan forms part of the Development Plan and therefore under the terms of Section 38(5) of the Planning and Compulsory Purchase Act (2004) constitutes the adopted plan against which planning applications must be considered. LPAs are able to refuse planning applications on the ground of inefficient use of land and this is supported by the previously described sections of PPG3, as well as the London Plan.
- 9.10 Other than in some suburban locations, it is likely that a density in excess of 30-50 dwellings per hectare will be required. The London Plan refers to PTAL ratings to assist with the assessment of appropriate densities. We have included the PTAL rating in the individual assessment of the sites in Part II of this Report. The shortcomings of these ratings were previously set out in Section 7. However, as they form the basis of the density ranges in the London Plan, we have made reference to these and considered the validity of the density range promoted in the London Plan.
- 9.11 The density ranges should therefore relate to the policy requirements (PPG3 and London Plan) taking into account the particular characteristics of the locality. This will include consideration of the existing building heights, scale of development and the overall character of the locality.
- 9.12 It is, however, inevitable that in order to seek to address these enhanced density requirements the scale of development will require an increased height and massing of built form and reduced car parking provision. This may not be appropriate in all locations and the individual local characteristics of the area must be considered. Developments in the region of 4-6 storeys or above, for example, are only likely to be appropriate within town centres. A scale of 3-4 storeys is normally appropriate in most urban localities, with 3 storeys in most suburban locations.
- 9.13 In order to assess the likely ranges of development which could be provided on the sites assessed in Chapter 8 of this report, we have included below appropriate densities and subsequent housing numbers for consideration by LBB. These are not intended to be prescriptive, but to allow LBB to consider the implications of the

proposed range of densities on its overall housing provision. We have considered these development options on Level 1 and 2 sites, as described in Chapter 8 of this report. Reference should also be made to the text and plans included in Part II of the Report.

Proposed Housing Densities - Level One Sites

Bromley North Station

- 9.14 This site is in a highly accessible location, with a high PTAL rating of 6a.
- 9.15 The surrounding area is a mixture commercial uses to the south and two storey dwellings to the north west and east. The location of the site lends itself to flatted development for smaller households.
- 9.16 The re-development of the site will require the re-location of the existing bus garage and the loss of car parking. The site is constrained by an existing listed building. This constraint is likely to impact upon the density of the development, as the relationship of the development with this building, may necessitate a reduction in the scale of development. It is likely that the height of the buildings as part of this development can be increased to the south of the site, although the relationship with buildings on Station Road should be carefully considered. It is likely that, in light of these important relationships, a Planning Brief should be produced to assist in the evolution of a well designed scheme.



P19: View from Tweedy Rd



P20: Car Park to rear



P21: Car Park & adjoining Bus Garage

- 9.17 If GLA density standards are applied, in the region of 260 dwellings should be provided LBB recommend a range of 68-113, with an estimation of 90 units.
- 9.18 Having reviewed the constraints and site specific circumstances, we consider the GLA's estimation to be excessive and consider a density range of 40 – 70 u/ha to be appropriate. This leads to a range of 90 – 160 units for the site; an increase over the LBB estimate.

Bromley South Station



P22: Bromley South Station



P23: Bromley South Station



P24: Bromley South Station

- 9.19 As is the case with Bromley North Station, Bromley South is in a highly accessible location, with a high PTAL scoring of 6a.
- 9.20 This site is less constrained with a range of building heights and types within the vicinity. The most sensitive buildings will be those adjoining the site at Masons Hill, which will need to be considered as part of the detailed design of the scheme.
- 9.21 LBB's policy aspirations on this site are for a mixed use development (including leisure). No planning brief has been published and no further detail is available on the scope of this use, although the new Police Head Quarters on part of the site has been completed and has been removed from the development site considered. Information is also unavailable on the remaining requirements on land take for any station facilities.
- 9.22 A higher density flatted development would be appropriate and could co-exist with a leisure development, for example this could formulate part of the ground floor of a block, with residential accommodation above.
- 9.23 LBB has indicated an estimated capacity of the site of 158 units, which is approximately 100 units per hectare. We believe that there is scope to increase the density of development in this location. A range of 80 – 120 units per hectare, which reflects the GLA's density for flatted schemes in the suburban area. We have not proposed the higher density proposed for urban and central areas for such development to reflect the potential requirements of the station and the need to include a leisure facility. This gives a range of dwellings from 127 to 190 units.
- 9.24 It is essential that a planning brief, or other supplementary planning document, is produced to forward the development of this site. This should include details of the proposed leisure facility and the operational needs of the station. The leisure use on the site should be carefully considered in terms of deliverability and whether this will

give rise to significant delays in securing the residential aspect of the scheme. Should the leisure uses be deleted from the proposals for this site, there may be scope to increase the number of residential units.

Widmore Road (Old Police Station)



P25: Former Police Station, First Church of Christ, Scientist

- 9.25 This site is again located in a highly accessible situation. It benefits from a prominent town centre position being well placed for local transport and services.
- 9.26 The site is constrained by existing buildings, with the Police Station being locally listed and the church being statutorily listed. Although there is potential to convert these buildings and develop the existing open areas, this will inevitably constrain the total number of units that could be provided.
- 9.27 The GLA standards would lead to approximately 42 units, with LBB's estimate lower at 21. We consider that this range of dwellings is reasonable and therefore recommend between 26 and 42 dwellings be provided on the site, leading to a density range of 40 – 80 u/ha.

Tweedy Road



P26: Junction with Gordon Way



P27: Tweedy Road

- 9.28 This site also benefits from easy access to existing local services and public transportation links. It has a high PTAL score of 5/6a.

- 9.29 The site lies in close proximity to Bromley College, which is a listed building, and the Court buildings. The site is long and rectangular in shape and lacking in depth, which could reduce the scale of development that can be achieved from the highest ranges.
- 9.30 However, subject to the impact of the development on these buildings being considered, it is likely that this site could still accommodate a reasonably high density of development. LBB consider that the site has a capacity of 23-25 units and the GLA 58. An outline planning application has been submitted for 24 flatted units, which is still under consideration.
- 9.31 We consider that the scheme is suited to a predominantly flatted scheme, but the constraints reduce the density normally applied to such locations, to a range of 28 to 75 dwellings, leading to a density range of 55 – 150 u/ha.

Worsley Bridge Road



P28: Worsley Bridge Road, Beckenham



P29: Worsley Bridge Road, Beckenham

- 9.32 The site lies in close proximity to existing residential flats and is in close proximity to a range of local facilities and open space, as described in more detail in Part II of this Report. The change in levels will constrain the density of the development of the site slightly, with the likelihood of higher scale development being located on the eastern section of the site.
- 9.33 This site has a low PTAL rating (1b), due to limited public transportation links. This will restrict the density of development that is appropriate, however the site is approximately 1km from local railway stations and is served by a bus route.
- 9.34 The Council has previously indicated a density range of 39 – 65 dwellings to be located on the site. We consider that the density should be increased and the range of dwellings should be 60 – 96, which is a density of 50 – 80 units per hectare, reflects the GLA's suburban density for a mix of terraces and flats in moderately

accessible locations. This is for PTALs of between 3 and 2. Although the rating for this site is 1b, we feel that the availability of local services and location of local stations within walking distance warrant such density.

Land off Goddard Road



P30: Land adjacent to Goddard Rd, Elmers End



P31: Land adjacent to Goddard Rd, Elmers End

- 9.35 This site is separated into three sections, with the residential element being approximately 0.5 ha. A Planning Brief has been produced by LBB and a planning application is now approved for 22 units.
- 9.36 Part of the western boundary of the site is with 2 storey dwellings, otherwise the other boundaries are either with the proposed business area extension or open land.
- 9.37 The site is in a accessible location and has a good PTAL rating of 4.
- 9.38 We consider that should the extant planning permission not be progressed, the density of the development could be increased, with London Plan standards seeking a density of 50 – 100 u/ha, for a mix of terraced houses and flats in a suburban location. This leads to a range of dwellings from 25 to 55 dwellings, which we consider to be reasonable in this instance.

Total Level One Provision

Site	Site Size	LBB Assumed No. Units	Density Range (units/ha)	No. Units
Bromley North Station	2.26	90	40-70	90-160
Bromley South Station	1.59	158	100-120	158-191
Widmore Road Old Police Station	0.52	21	40-80	26-42
Tweedy Road ¹	0.5	23-25	55-150	28-75
Worsley Bridge Road	1.2	65	50-80	60-96
Land off Goddard Road ²	0.52	24	50-100	25-55
TOTALS	6.59	381-383		387-619

Table 21: Level One Sites

1 Planning application -

2 Planning application - 22 units

Note: The above figures are for the basis of statistical analysis for discussion purposes and should not be considered as final figures.

Proposed Housing Densities - Level Two Sites

Oakley Road

- 9.39 This site has a low PTAL rating, which reflects relatively few linkages with public transport nodes.
- 9.40 The surrounding residential dwellings to the north, east and south are two storey. A three storey development is likely to be appropriate for this site.
- 9.41 In these circumstances we consider that a density of 30 – 50 u/ha is appropriate. This will ensure an acceptable level of development, whilst still providing a good use of land. This would lead to a range of 17 to 26 dwellings.

Land off Bushell Way

- 9.42 This site has a low PTAL rating of 1b/2. This reflects that it is served by some local transport facilities (albeit limited) and is within walking distance of local services.
- 9.43 This site is linked to existing residential development and is in close proximity to the local College, school and the remaining open space. The existing adjacent residential development is a relatively dense nature, with some elderly person accommodation.

- 9.44 The constraints of the site primarily relate to its relationship with the adjoining open space. To ensure a good relationship between the development site and open space there will need to be a soft edge to the development, which will protect the visual amenities of these areas. The adjoining public open space could potentially have linkages with the proposed development, whilst not forming part of the site. This may reduce the total amenity provision required within the development site itself.
- 9.45 This leads to a range of appropriate densities being 50 – 80 u/ha, leading to 100 – 160 units.

91-117, Copers Cope Road

- 9.46 This site is an area of land to the rear of existing two storey dwellings. It borders existing residential cartilages on all boundaries except to the west, which is formed by the railway line.
- 9.47 The surrounding residential locality is characterised by reasonably low density dwellings, which are generally semi detached, with spacious rear gardens.
- 9.48 The site is constrained by access issues, which will necessitate the need to remove two existing dwellings and trees that are subject to a TPO.
- 9.49 The site has a low PTAL scoring, although it is located in close proximity to New Beckenham station, which makes the site more accessible than this rating would otherwise suggest.
- 9.50 The key determining issue with respect to the density are the constraint created by the access and trees and the need to provide adequate separation between habitable rooms, in a back to back relationship.
- 9.51 Based on these issues, we consider that a density in the range of 30 – 50 u/ha is appropriate, leading to a range of dwellings of 27 to 45.

Bromley Common (Blue Circle Sports Ground)

- 9.52 This is the largest site within this group and presents an opportunity for a master planned approach to the delivery of housing.

- 9.53 The site is presently bordered to the west and north by a range of residential densities, including some higher density development on the south east border. The site can accommodate a significant amount of housing, with a range of densities.
- 9.54 The PTAL score is 3, which represents reasonable access to local transport facilities and local services are within walking distance.
- 9.55 A planning brief, or other supplementary planning document, should be produced to ensure the sympathetic development of the site and to secure appropriate infrastructure, such as public open space and community facilities; it could also deal with appropriate phasing. The provision of these facilities will have an impact on the density that can be achieved.
- 9.56 We therefore propose a density range of 50 – 80 u/ha, which would lead to an overall range of units of 688 – 1100 dwellings, reflecting these infrastructure requirements.

Total Level Two Provision

Site	Site Size	Density Range (units/ha)	No. Units
Oakley Road	0.58	30-50	17-26
Land Off Bushell Way	2	50-80	100-160
91-117 Copers Cope Road	0.89	30-50	27-45
Blue Circle (Bromley Common)	13.75	50-80	688-1100
TOTAL			832-1331

Table 22: Level Two Sites

Note: The above figures are for the basis of statistical analysis for discussion purposes and should not be considered as final figures.

Conclusions

- 9.57 We have reviewed the densities of the proposed housing sites, revealed in the assessment of sites included within this report.
- 9.58 We consider LBB should seek to increase the density of emerging sites. This is in order to protect the GB and MOL sites from future development and to take a more sustainable approach, by ensuring that brown field opportunities are fully utilised. This needs to be achieved without creating undesirable forms of development. In order to advance discussion on these issues, we have recommended a range of densities that have generally been above those envisaged by LBB, but generally within or below the guidelines set by the London Plan.

9.59 Increased densities are central to Government policy. Whilst it is important to respect the overriding characteristics of the housing stock in LBB, it is also important that the Council take forward strong design initiatives to secure high quality housing, with increased densities. This will mean a proactive approach to producing planning briefs, master plans, design guidance or other supplementary planning documents to assist developers in formulating quality high density schemes within set parameters. The level of certainty created by such an approach should also assist in bringing these sites forward for development.

10.0 CONCLUSIONS AND RECOMMENDATIONS

- 10.1 NLP has undertaken a review of the London Borough of Bromley's housing policies in light of the comments made by the Inspector in her report following the UDP Inquiry held in 2003.
- 10.2 The Inspector made a number of recommendations and highlighted some shortfalls in the current housing supply position. The most important of these related to issues concerning the shortfall of annual housing provision required to meet the UDP housing targets. The Inspector concluded that this has led to a shortfall of housing in the region of 1,000 units in 2001. She recommended a detailed analysis of this housing situation and a review of potential sites that could be utilised to meet this shortfall. She recommended the use of 'reserve sites', to be utilised if required to meet identified housing supply objectives. She also suggested an assessment of the local dynamics of the local housing market.
- 10.3 NLP has reviewed the relevant planning policy background and in particular the requirements of PPG3 and the London Plan. The latter document identifies an overall housing requirement of 11,450 dwellings in the period 1997 to 2016, consistent with the figure within the draft UDP. Policy within the London Plan also sets out a presumption against inappropriate development in the MOL and Green Belt, except in very special circumstances.
- 10.4 NLP has undertaken a review of the Council's housing figures, including an assessment of the windfall allowance and delivery of permissions. As a basis for review, this assessment accepted the windfall allowance and the overall housing provision targets in accordance with the London Plan. Our analysis concluded that if the rates of delivery continue at the present rate there will be a shortfall of 2,000 units at the end of the Plan period in 2016.
- 10.5 The review of housing dynamics in this Authority included an assessment of unimplemented permissions, which had previously been highlighted as an issue in the UDP Inquiry.
- 10.6 We assessed the delivery of permission figures against other neighbouring London Boroughs and found LBB to be only slightly below average.

- 10.7 With respect to unimplemented permissions, we found that only a small number of schemes will not be completed. This suggests that LBB should review their monitoring to ensure that this information is accurate, as our work suggests that the Inspector's concerns over the delivery of permissions are based on information that is out of date. The information on house prices in LBB and neighbouring authorities confirms that there appears to be no issue with respect to price, or LBB as a location for property investment. We discovered that in excess of 800 units are currently under construction.
- 10.8 Following our sequential analysis of all potential sites, the proposal sites put forward by LBB were considered the most appropriate locations for housing development, supporting the Council's initial allocations. From our analysis in Section 4, it is evident that the existing shortfall and future shortfall (if the number of units constructed continues at the same rate) must be addressed. Furthermore, there may be an additional requirement placed on LBB to provide more housing following the review of the London Plan.
- 10.9 The sequential analysis, which included a review of potential housing sites on existing open space, identified some sites that displayed some sustainable characteristics and warranted further assessment. This also followed a review of all of the omission sites. The appraisal identified three levels of sites in terms of their potential sustainability. This resulted in the identification of Level 1 sites, which should be allocated for housing and Level 2 sites that could be utilised if there is a confirmed need or ear-marked for future purposes (taking into account the Inspector's requirement for 'reserve sites'). These sites are included in detail within the report and include UOS, MOL and GB sites, which display the most sustainable characteristics in sequential analysis terms.
- 10.10 Level 3 sites were determined to be unsustainable and were rejected.
- 10.11 The density of development has been assessed and in particular the potential capacity of Proposal Sites and other sites that have come forward as part of this analysis. This review confirms the need for LBB to take further steps to achieve the best use of land, taking into account the density requirements of the London Plan. It is essential that higher densities (beyond current capacity estimates) are achieved to ensure that the most sustainable development options are pursued in the future and in order to protect the MOL and GB locations within LBB. By recommending reasonable density increases, the number of units to be developed on the Proposal

Sites increases from 383, using LBB's site capacity estimations, to a range of 387 to 619 units.

10.12 Therefore, the main options available to LBB, to address the identified shortfall of housing, are to increase the densities of existing housing sites and/or designate additional sites for housing.

10.13 The most sustainable option is clearly to enhance existing densities. We have demonstrated that densities can be reasonably increased to assist in meeting the shortfall, in accordance with PPG3 and the London Plan, whilst respecting the character of the locality. However, although in policy terms this is the most sustainable option, this cannot address the entire shortfall identified by the Inspector. It is essential that these increased densities should not only be applied to existing and emerging Proposal Sites, but that LBB should also apply this to all windfall sites as they come forward.

10.14 It is inevitable that all the Level 2 sites highlighted in this Report will be required during the plan period. Although the development of green field sites will generally be the least sustainable option, the detailed analysis leading to the recommendation of these sites has exhausted all other alternatives and provided the best performing sites in sequential terms.

10.15 Based on the above conclusions we make the following recommendations:-

- i) LBB should review its monitoring information and practices, to ensure that this information is up to date and accurate;
- ii) LBB should seek to work proactively with developers to ensure that proposals display a high quality of design taking into account the density requirements included within the London Plan;
- iii) LBB should consider and review the proposed increased densities suggested by NLP for its existing Proposal sites and emerging windfall sites and, in light of this, undertake early discussions with landowners and developers to re-evaluate the potential of these sites;
- iv) LBB should provide planning briefs (or other documents setting out design guidance including information on density, phasing etc) on all of its Proposal Sites to provide greater certainty to potential developers and landowners, and assist in these sites coming forward for development; and
- v) LBB should consider the following list of potential housing sites (identified as Level Two sites) which can deliver a range of 832 and 1,331 additional units:

- Oakley Road

- Land off Bushell Way
 - 91-117, Copers Cope Road
 - Blue Circle (Bromley Common)
- vi) LBB should determine whether the proposed Level 2 sites fail to meet the requirements of Green Belt or MOL by reason of inappropriate boundaries or designation and meet the requirements of the Inspector to make provision for 'reserve sites', constituting 'exceptional circumstances' as referred to in para 4.8.29 of her Report, to warrant development on existing UOS, MOL and GB sites.