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Dear Stuart

LONDON BOROUGH OF BROMLEY: HOUSING PROVISION REQUIREMENTS

Introduction

NLP has been commissioned by the London Borough of Bromley (LBB) to update its advice with respect to housing allocations, in light of the draft consultation on housing provision produced by the GLA, discussions with their Officers and feedback from Members.

We have reviewed the implications of the Mayor of London's 'draft London Plan Alterations - Housing provision targets'. This document was published in July 2005 for initial consultation with the London Assembly and the GLA Group.

This document will be the subject of a three month public consultation period in October, with an Examination in Public next year.

Proposed London Plan Alterations

The main implication of the Alterations is to increase the London-wide housing target from 23,000 to a commitment to identifying a capacity leading to an output of 30,000. This increase has previously been presented by the GLA and was recognised as a potential future need by the UDP Inspector, at the UDP Inquiry.

In her report, the Inspector indicated that the current UDP housing provision may need to be revised upwards, in light of future London Plan requirements. This was one of the reasons why she raised the issue of the potential of allocating 'reserve sites', to address this future need and her concerns regarding housing delivery.

The Inspector's concern over the need for a future upward increase proved to be unfounded. The requirements for London Borough of Bromley (LBB) are shown to be reduced from 570 per annum to 520 per annum. This gives an overall target of 5,200 in the ten year period up to 2016/17 rather than 5,700. As such, there is a total reduction of 500 units in the ten year period.

There are some other more minor proposed alterations to the London Plan, which are also subject to this consultation. These make reference to the 2005 Housing Capacity Study and the Barker Review.



Implications of Proposed Alterations on LBB

The main implications of the proposed Alterations relate to the housing numbers which LBB is required to deliver.

Nathaniel Lichfield and Partners (NLP) produced a Housing Strategy for LBB in May 2005. This report accepted the Inspector's identified shortfall of 1,000 dwellings against London Plan requirements and UDP policies for the period up to 2001. Our analysis indicated that the shortfall will be in the region of 2,000 in 2016, if the levels of delivery continue.

Based on the Alterations now proposed, the current overall requirement will be reduced by 500 units to 10,950, which will lead to a reduction in the potential future shortfall. It is therefore necessary to re-consider the amended housing shortfall and how this can be addressed in sequential terms. It is essential that in the first instance existing brownfield opportunities or existing allocated sites are considered before other potential sites, in accordance with our previous Strategy and PPG3.

The delivery of houses in LBB in the period 1997 to 2003, other than in 2002, consistently fell below the reduced requirement for 520 units per annum, which was included in our previous Strategy. However, this rate of delivery increased to 606 dwellings in 2004 and figures for the first quarter of 2005, indicate 193 completions, which is again above target. This supports the conclusions of our previous Housing Strategy which found no obvious barriers to the delivery of housing. LBB will need to carefully monitor the delivery of housing and project the likely levels of delivery on the basis of permissions, allocations and windfall sites. This is required to determine whether the 2004 and early 2005 figures will be reproduced in the future. However, with the increase in delivery in 2004 and early 2005, the average rate remains below target, with a shortfall of in the region of 1000 in the period up to 2001 remaining. The potential for an additional shortfall remains a key issue for LBB and the conclusions from our Housing Strategy indicate that this may continue to increase. It therefore remains our view that provision either by way of increasing densities and/or allocating additional sites is still required to be made, despite the reduced requirements in the proposed alterations.

As indicated in our previous Strategy, an increase in density of existing allocated sites would have a marginal impact on the overall number of units. Two of the sites have already been the subject of planning applications. There may be an opportunity for high, or higher, density schemes to be grasped at the remaining sites, which LBB will need to carefully monitor. However, it remains our conclusion that the shortfall, despite the reduction, still cannot be addressed by increasing densities closer to London Plan requirements.

Below we reproduce Table 21 of our Housing Strategy. This includes the 'Level One' sites, which were considered to be the most acceptable in sustainability terms:

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 1: Level One Sites

1 Planning application - 24 units (pending consideration)

2 Planning application - 22 units (granted May 2005)

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

The above table demonstrates that increasing densities alone cannot meet the existing shortfall of 1,000 units in the period up to 2001 and any additional shortfall in the Plan period. Therefore, additional sites should be sought in sequential terms.

In our Housing Strategy we reviewed the Council's windfall allowance, which the Inspector considered could be excessive, but which we concluded, in the light of available evidence, to be reasonable. However, in light of discussions between LBB and GLA Officers, we have been requested to assess whether higher densities could be reasonably applied to assist in meeting this identified shortfall.

NLP has reviewed windfall development, which received permission over the past 12 months. Our findings demonstrate that the densities applied to these developments are within appropriate ranges when considered against PPG3 and London Plan requirements, whilst reflecting the character of the surrounding area. Based on this initial appraisal, there appears to be no significant shortfall. The appraisal is enclosed in full with this letter.

Based on this information, we do not consider that there are significant issues with respect to the densities which are currently linked to windfall development. However, it is essential that LBB apply strict density criteria when assessing such proposals. This should ensure that windfall developments make the maximum reasonable contribution of housing, whilst creating an effective and attractive design which is sympathetic to the character and quality of the locality.

Our Housing Strategy identified 'Level Two' sites. These are the most sustainable of other site options, following an assessment of all known alternatives, Green Belt, Metropolitan Open Land and Urban Open Space, to meet an identified need. In light of evidence that existing and windfall sites cannot meet the existing and emerging shortfall, in sequential terms, the most sustainable alternatives must be considered.

We reproduce Table 22 of our Housing Strategy, which confirms our 'Level Two' sites and their potential capacities:

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 2: 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).

'Level Two' sites provide an additional capacity for 832 to 1,331 units, which is still likely to be required to meet the shortfall of housing units.

It is clear that reduced housing requirements included in the proposed GLA Alterations must not be considered in isolation. The existing shortfall of 1,000 units for the period up to 2001 remains, and still needs to be addressed, and we consider requires the allocation of additional sites.

Conclusions and Recommendations

The proposed draft London Plan Alterations will lead to a reduced annual and overall requirement for housing to be provided within the London Borough of Bromley, both annually and cumulatively in the ten year period up to 2016/17. There is an overall reduction of 500 dwellings, from previous London Plan requirements.

Nevertheless, there remains a historic shortfall in the region of 1,000 dwellings, in the period up to 2001, which must be addressed. There is a strong likelihood of this shortfall increasing, as historic rates of delivery suggest the reduced targets may not be met. This may lead to a shortfall of in the region of 1,500, by the end of the plan period.

The windfall allowance was previously reviewed and considered to be reasonable. This has been re-assessed by taking a sample of sites (of the most recently developed sites) to determine whether the density of development could be increased. This appraisal demonstrates that the densities are reasonable and that there is little scope for this to be increased, without damaging the character of these localities.

In light of this we still consider that there is likely to be a shortfall of housing against emerging as well as existing plan requirements. On the understanding that these circumstances remain unaltered, we believe that the existing allocated sites cannot meet this shortfall, even with increased densities, or reasonable windfall projections. Therefore, it still remains essential for the Council to consider additional sites, referred to as 'Level Two' sites in our May 2005 Strategy, to meet the statutory housing requirements. These 'Level Two' sites present the most sustainable alternatives in light of these circumstances.

It is therefore important that LBB continue to review the potential of the 'Level Two' sites, set out above, in order to meet its existing and emerging housing requirements

Yours sincerely

**DAVID AMES
ASSOCIATE**