

## **DEVELOPMENT CONTROL COMMITTEE**

Minutes of the meeting held at 7.30 pm on 9 June 2015

### **Present:**

Councillor Nicky Dykes (Vice-Chairman)  
Councillors Vanessa Allen, Graham Arthur, Douglas Auld,  
Teresa Ball, Kathy Bance MBE, Nicholas Bennett J.P.,  
Katy Boughey, Simon Fawthrop, Ellie Harmer, Russell Mellor,  
Alexa Michael, Sarah Phillips, Richard Scoates, Colin Smith and  
Michael Turner

### **Also Present:**

Councillors Robert Evans, Will Harmer, William Huntington-Thresher,  
Tony Owen and Pauline Tunncliffe

### **1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**

Apologies for absence were received from Councillors Eric Bosshard, Lydia Buttinger, Peter Dean and Charles Joel; Councillors Nicholas Bennett JP, Sarah Phillips, Colin Smith and Teresa Ball attended as their substitutes respectively.

An apology for absence was received from Councillor David Livett and an apology for lateness was received from Councillor Colin Smith.

In light of Councillor Dean's absence, Vice-Chairman Councillor Nicky Dykes acted as Chairman for the meeting.

### **2 DECLARATIONS OF INTEREST**

No declarations of interest were received.

### **3 CONFIRMATION OF THE MINUTES OF THE MEETINGS HELD ON 24 MARCH 2015 AND 13 MAY 2015**

Minutes of 24 March - Minute 52, paragraph 3 (page 11) - LB Bromley Local Intermediate Housing Income Threshold Review

The first sentence was amended to read: '*One Member was concerned with the level being raised at a time when employment was low and salaries were not great.*'

Minutes of 13 May - Minute 3(ii), (page 14) - Plans 2 Sub-Committee

Councillor Nicholas Bennett JP to replace Councillor Ian Dunn.

**RESOLVED that, subject to the amendments set out above, the Minutes of the meetings held on 24 March 2015 and 13 May 2015 be confirmed and signed as a correct record.**

**4 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING**

The following written question was received from Mr Anthony Barnes, Heathfield Road, Keston:-

*With regard to Agenda Item 9 of the Committee, are Councillors aware of the sheer weight of traffic that uses Croydon Road onto which this piece of land fronts? This in turn leads to long tailbacks in all directions, heavy congestion and serious road safety concerns.*

The Chairman's response was as follows:-

*Agenda Item 9 relates to a proposed Article 4 Direction to restrict permitted development rights on the land. It is acknowledged that this is a busy road which reflects its designation as a Strategic Route. The removal of permitted development rights is likely to result in a reduction in any additional traffic that may be generated by any development or use at this land.*

**5 LB BROMLEY FIVE YEAR HOUSING SUPPLY PAPER JUNE 2015**

**Report DRR15/055**

Members considered the five year housing supply position from 1 April 2015 to 31 March 2020.

The National Planning Policy Framework specified that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. This report concluded there was a suitable five year housing supply in the Borough, based on the latest London Plan housing policy.

The Chief Planner outlined the content of the report and drew Members' attention to the circulated letter received from Robinson Escott Planning LLP in response to the new housing supply target.

The new target of 641 units in the London Plan was principally due to an increase in small sites allowance identified in the latest London Strategic Housing Land Availability Assessment (SHLAA) by the GLA and accepted by the Planning Inspector following an Examination in Public. One Member questioned why this had not previously been predicted by the Council. The

Chief Planner reported that whilst the Council's concerns had been expressed, the Inspector had accepted the GLA's SHLAA forecasts of what they considered could be provided and this underpins the London Plan housing policy. This and the delivery of sites over the five year period can be clarified.

The Government had introduced Regulations in May 2013 to extend permitted development rights allowing for a change of use from B1(a) to C3 subject to a prior approval process up to May 2016 although the long-term future of this process is unclear.

The new 10 year housing delivery period had begun in April 2015. Targets which had been exceeded in any one year, could normally only be carried over during this 10 year period and not beyond.

With regard to the five year housing land supply table on page 30 of the report, officers would liaise with Members who during the meeting, queried sites identified within their Wards, and make minor amendments in response to these and other matters raised at the meeting.

**RESOLVED that, subject to liaison with Members concerning sites identified within their Wards, the five year housing supply position from 1 April 2015 to 31 March 2020 be agreed with minor amendments.**

**Subsequent to the meeting, the Housing Supply table was updated; the amended version can be viewed at Appendix 1 to these Minutes with changes shown underlined in red.**

## **6 MINOR ALTERATIONS TO THE LONDON PLAN CONSULTATION DRAFT HOUSING STANDARDS AND PARKING STANDARDS**

### **Report DRR15/062**

Members considered the Minor Alterations to the London Plan on Housing Standards and Parking Standards. These were prepared to bring the London Plan in line with new national housing standards and car parking policy.

Members also considered the Local Authority's response to the Mayor of London in relation to the Minor Alterations to the London Plan.

One Member supported the continuation of pursuing the proposal that the DLR be extended into Bromley.

Whilst Members welcomed what they considered to be 'a small step in the right direction', they agreed that more flexibility in parking provision was required. It was suggested that the Local Authority's response to the Mayor be strengthened to draw his attention to the fact that Members were far more knowledgeable of the needs and requirements within their own Wards.

The Head of Planning Strategy agreed to check and inform Members whether the target for water usage of 105 litres per day related to per household.

The following amendment was made to the Local Authority's response to the Mayor of London:

Parking Standards, page 40, paragraph 1, final sentence:- 'However, *whilst the overall* direction of the alterations is welcomed, .....

**RESOLVED that:-**

- 1) **the Minor Alterations to the London Plan 2015 housing Standards and Parking Standards be noted; and**
- 2) **subject to the amendment highlighted above, the proposed response to the Mayor of London in relation to the Minor Alterations to the London Plan be endorsed.**

**7 AUTHORITY MONITORING REPORT 2012/13**

**Report DRR15/059**

All local Authorities are required under Section 13 of the Localism Act 2011, to produce an Authority Monitoring Report (AMR). The AMR should set out progress achieved in the implementation of the Local Development Scheme, the progress and effectiveness of the Local Plan and the extent to which the policies set out in the Local Plan were being achieved.

In accordance with the requirement set out above, Members considered the Council's Authority Monitoring Report for 2013/14.

Paragraph 5.6 (page 59) was amended to read:- 'The total number of dwellings completed as affordable housing in 2013/14 was 117 units in comparison with 161 units in 2012/13 and 213 units in 2011/12.

Officers agreed to check and report back to Members on the following questions:-

- page 50 - what was the confirmed total of Bromley's Population 2011;
- page 54, para 4.9 referred to five District Centres but only four were listed; what was the fifth?
- page 64, para 8.4 (Education) – Of the 86 applications lodged, 37 related to school provision and 3 related to day nurseries. What did the remaining 46 applications relate to?

**RESOLVED that the Authorities Monitoring Report for 2013/14 be agreed.**

## 8 PLANNING REPORTS

### 8.1 (15/00969/FULL2) - Manorfields, Avalon Road, Orpington

Members considered the following planning application report:-

Item No.	Ward	Description of Application
8.1 (page 81)	Orpington	Change of use from care home for the elderly (Class C2) to short term accommodation for the homeless (Sui Generis), refuse store and alterations to fenestration.

The Development Control Manager provided Members with the following verbal update:-

This application is submitted by the London Borough of Bromley.

Since a variety of issues which are not generally material planning considerations have been raised in representations about this application, Members should ensure that the determination of the application is in accordance with Section 38(6) of the Planning and Compulsory Purchase Act which states that this must be made in accordance with the development plan unless material considerations indicate otherwise. The report sets out the key material planning considerations and in particular the relevant development plan policies.

A number of late representations have been received and are on the file. The matters raised are similar to those set out in the summary of objections within the report and in addition express concern about the process.

1. The second paragraph on page 82 – Statement regarding referral of tenants is incorrect – the applicant has confirmed “All referrals will be made solely by the Housing Team at the London Borough of Bromley” the Housing Team would have sole nomination rights to the accommodation and Orchard and Shipman cannot select tenants themselves or receive referrals from a third party.
2. In respect of references to Supported Housing the applicant has confirmed that the accommodation proposed is for specialist accommodation for homeless households with low to medium support needs, and would not be used for supported housing for those with high support needs such as pronounced mental health issues, ongoing addictions or ex-offenders. This could be the subject of a planning condition.
3. Reference to House In Multiple Occupation (HMO) – The Council’s Environmental Health Housing Officer has confirmed that the HMO is exempt from HMO restrictions will not be licensable and the legislation “Management

of Houses in Multiple Occupation (England 2006) will not apply. The maximum occupation of the HMO units would be 102 persons if all units were at maximum occupation. The self-contained units would accommodate an additional maximum of 16 persons (total 118). The revised plans submitted in May overcome the concerns raised in the report about light and ventilation. This updates the reported comments on pages 85 and 86 of the agenda.

4. Page 84 last bullet point of summary of objections should refer to 5 years and not 5 days.

Oral representations in objection to the application were received from Mr Ned Helme, Barrister for the Avalon Area Action Group (AAAG). Mr Helme made the following points:-

This was clearly a Local Authority application and Members were requested to be mindful of the required approach in determining the application and the issues of predetermination and bias. The AAAG's letter to the Planning Department of 22 April raised some fundamental objections. The application should be determined in accordance with the Development Plan unless material considerations indicated otherwise.

The site was not a sustainable location. The proposed facility would be served by just one bus service operating on a circular route. With regard to traffic and parking, as the facility would essentially provide accommodation for families, this was likely to generate more traffic in the immediate locale and the proposed provision of 17 car parking spaces would result in a lower parking level than that provided at Bellegrave.

For reasons of over-intensification, unsustainability, parking levels, impact on local services, security and impact on character and amenity, Members were urged to reject the application.

Oral representations in support of the application were received from Mr Jim Bailey, agent for the applicant. Mr Bailey made the following points:-

The proposal would meet social need as an alternative to costly hotels and bed and breakfast accommodation. The amenity of neighbouring residents would be protected by ensuring that high standards of behaviour were achieved and maintained by tenants. The existing bus route was sufficient to serve the site and parking standards had been met.

In response to Member questions, Mr Bailey confirmed that the maximum number of tenants at the facility would not exceed 118. With regard to obtaining Secure by Design Certification, following the advice of the Secure by Design Officer, security cameras and secure locks on all windows and doors would be implemented and completed prior to occupation of the building. Mr Bailey believed the proposal was comparable with the existing Bellegrave facility which was operated by the same company and provided the same type of accommodation. He was not aware of any problems arising

at Bellegrove. Tenants would remain at the facility until the Local Authority found them more permanent accommodation. The proposed one-bedroom units would primarily be utilised by single pregnant women or women with children.

Oral representations in support of the application were received from the Portfolio Holder for Care Services, Councillor Robert Evans. Councillor Evans made the following representations:-

Whilst Care Services was operated as efficiently as possible, there was currently great financial pressure to save money in all service areas of the Council. However, that being said, it remained vitally important to support the Borough's vulnerable residents. There were currently about 1,000 homeless family units, 70-80% of which included at least two children. The Council had a duty to accommodate homeless people until a more permanent residence was found. The use of redundant care homes as temporary accommodation would save the Council from having to pay for nightly accommodation - often out-of-Borough - which was expensive and quite often ruinous to families.

Manorfields would provide a similar arrangement to Bellegrove which had proved to be a financial success. Whilst the fears of local residents was understandable, potential tenants would be thoroughly vetted to ensure that no problematic clients were placed at Manorfields and in this respect, they would be required to sign a tenancy behaviour agreement.

In response to Member questions, Councillor Evans reported that a cross-section of residents would be placed at Manorfields with each application being assessed individually. The facility was located at a reasonable distance from Orpington Town Centre.

Oral representations were received from Ward Member Councillor William Huntington-Thresher. Councillor Huntington-Thresher commented that in light of the updates provided at the meeting, it was only reasonable for residents to have an opportunity to challenge and respond to any further conditions that may be attached to the proposal.

Councillor Fawthrop considered the provision of 12 bathrooms and 3 kitchens shared by 118 people to be insufficient. In his opinion, the application was an over-intensification of the site which could be developed into something more suitable and accommodating. For this reason he moved that the application be deferred to seek a reduction in units.

Councillor Arthur moved that the application be granted provided a robust vetting process of tenants was implemented. This was seconded by the Chairman.

Councillor Auld seconded the motion for deferral. Whilst not entirely against the proposal, the application as it currently stood, would result in a

development which would be out of character with the area and would result in an increase in traffic.

The following points were generally agreed:-

- there would be no increase in the footprint of the site;
- the Council had a social duty to help homeless people in the Borough;
- the facility was located within reasonable distance of Orpington Town Centre and served by a bus route operating every 15 minutes;
- there were no reasons to refuse the application on planning grounds.

Members having considered the report, objections and representations, **RESOLVED that PERMISSION BE GRANTED as recommended, subject to the conditions and informative set out in the report of the Chief Planner.**

## **9 LAND ADJACENT TO THE DRIFT, KESTON BR2 8HL**

### **Report DRR15/064**

Members were requested to consider an Article 4 Direction in relation to land adjacent to The Drift, to remove permitted development rights for various classes of development. This land had been identified as being a sensitive area of Green Belt and vulnerable to development that may be carried out under permitted development which could harm the openness and character of the area.

Members were pleased to note the request for an Article 4 Direction to protect this sensitively located piece of Green Belt land. Although already protected to a certain degree, development under existing permitted development rights could have a major impact on the land and lead to increased traffic congestion.

**RESOLVED that the proposed Article 4 Direction be endorsed and the Portfolio Holder for Renewal and Recreation be recommended to authorise an Article 4 Direction for land adjacent to The Drift to remove permitted development rights for the following classes of development in the Town and Country Planning (General Permitted Development) Order 2015:-**

- (i) **erection or construction of gates, fences, walls or other means of enclosure (Class A of Part 2);**
- (ii) **formation, laying out and construction of means of access (Class B of Part 2);**



- (iii) provision of temporary buildings, etc (Class A of Part 4);
- (iv) temporary uses of land for any purpose for not more than 28 days per year (Class B of part 4); and
- (v) use of land as a caravan site (Class A of Part 5).

**It was further recommended that the Direction be made with immediate effect for the classes of development specified in (i) to (v) as the Council considered that development could be prejudicial to the proper planning of the area or constitute a threat to the amenities of the area.**

## **10 CONFIRMATION OF PROPOSED ARTICLE 4 DIRECTIONS BROMLEY TOWN CENTRE**

### **Report DRR15/045**

Members were requested to consider Article 4 Directions in relation to three areas of Bromley Town Centre on the basis that it was expedient to do so to avoid harmful impacts upon the local economy.

The effect of the Directions would be that a change of use from Office (Use Class B1(a) to Residential (Use Class C3) would require planning permission removing the 'permitted development rights' under Schedule 2 of the GPDO 2015.

As Ward Member for Bromley Town Centre, the Chairman reported that she and her Ward colleagues supported the making of the Article 4 Directions as a large amount of office use had already been lost to Bromley Town.

Whilst Councillor Bennett JP did not specifically disagree with the making of Article 4 Directions, he did recognise that the world was changing and in cases where offices had remained vacant for some considerable length of time, it could make more sense for a change of use to be implemented.

### **RESOLVED that:-**

- 1) the confirmation of the Directions on the basis that it was expedient to restrict the change of use from offices to residential in parts of Bromley Town Centre be endorsed;**
- 2) this matter be referred to the Renewal and Recreation PDS Committee where the Portfolio Holder be recommended to:-**
  - a) confirm the Article 4 Direction to remove the Permitted Development of Class J (now O) to come into effect on 1 August 2015 for the Bromley North Area (as shown on the map);**

- b) confirm the Article 4 Direction to remove the Permitted Development of Class J (now O) to come into effect on 1 August 2015 for the London Road Area (as shown on the map); and
- c) confirm the Article 4 Direction to remove the Permitted Development of Class J (now O) to come into effect on 1 August 2015 for the Bromley South Area (as shown on the map).

## 11 PLANNING APPEALS - COSTS 2014/2015

### Report DRR15/054

Members considered an update on the award of costs in planning appeals for the 2014/2015 financial year.

Members agreed it was important to reinforce their reasons for refusing applications as the majority of costs was awarded due to lack of evidence.

Regarding Case Ref 14/00104 – 1 Edward Road (page 119), the Chief Planner agreed to check and report back to Members on the reason for non-determination of this application.

~~Councillor Fawthrop recommended that Members' views and knowledge should be used on occasion to strengthen reasons for refusal.~~

*(Amendment made on 13 July 2015) - Some Members commented that it should be the policy of the DCC that, where appropriate, the recommendation of "members views requested" be used in reports to Development Control and Plans Sub-Committees.*

**RESOLVED that the report be noted and Members' views and knowledge be used to strengthen reasons for refusal.**

## 12 PLANNING APPEALS MONITORING REPORT (APRIL 2014 TO MARCH 2015)

### Report DRR15/048

Consideration was given to an update on planning appeals received and decided for the year 2014/15.

Councillor Bennett JP was disappointed to note that Bromley had lost 48% of appeals compared to the national figure of 34%; this clearly indicated existing issues which needed to be addressed.

Councillor Michael reported that the Local Authority had won more cases with written representations compared to the national average. The Local Authority dealt with more contentious applications due to issues such as the resulting impact on Green Belt land.

**RESOLVED that the report be noted.**

**13 DELEGATED ENFORCEMENT ACTION (JANUARY TO MARCH 2015)**

**Report DRR15/057**

The report outlined enforcement action and prosecutions authorised by the Chief Planner under Delegated Authority during the period 1 January 2015 to 31 March 2015.

**RESOLVED that the report be noted.**

**14 ENFORCEMENT MONITORING REPORT (APRIL 2014 TO MARCH 2015)**

**Report DR15/058**

The report provided an update of enforcement activity from 1 April 2014 to 31 March 2015.

With regard to the prosecution case being processed for Pickhurst Lane, West Wickham, the Chief Planner confirmed that information had been sent to relevant Ward Members however, as Ward Member for West Wickham, Councillor Bennett JP, was unaware of the case. The Chief Planner agreed to check that the information had been sent to the correct Ward Members.

One Member suggested that direct actions undertaken by the Local Authority should be publicised as a warning to others that non-compliance with notices was not accepted.

**RESOLVED that the report be noted.**

**15 MINOR AMENDMENTS TO THE SCHEME OF DELEGATION**

**Report DCS150079**

Members were asked to consider proposed minor amendments to Development Control Committee delegations to authorise officers to act on behalf of the Council; if approved, this would be referred to Council for inclusion in the Scheme of Delegation to Officers.

It was reported that the proposed change to para. (vi) on page 145, was recommended to ensure that the Council would be able to appeal if necessary. Councillor Fawthrop had concerns with regard to costs being awarded against the Council and recommended that the wording be changed to read:- *'determine whether or not to contest an appeal against non-determination and where relevant provide grounds of appeal and contest all appeals including all action necessary to prevent or reduce the likelihood of an award of costs against the Council.*

*Development Control Committee*  
*9 June 2015*

Paragraph (i) under the heading of 'Notes' (page 147) was amended to read:-  
'No decision will normally be issued within 3 weeks of the date of the weekly  
*lists* supplied to Members.

**RESOLVED that subject to the amendments outlined above, the proposed minor amendments to development Control Committee delegations be approved and referred to Council for inclusion in the Scheme of Delegation.**

The meeting ended at 9.20 pm

Chairman

### **LB BROMLEY FIVE YEAR SUPPLY OF HOUSING**

#### **FIVE YEAR SUPPLY OF DELIVERABLE LAND FOR HOUSING (June 2015)**

#### **1.0 NATIONAL AND LONDON-WIDE POLICIES AND GUIDANCE**

##### **NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (March 2012)**

- 1.1 The NPPF specifies in paragraph 47 that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
- 1.2 The NPPF specifies that to be considered deliverable, sites should be available now, offer a suitable location for development, be achievable with a realistic prospect that housing will be delivered on the site within five years and that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years.
- 1.3 Paragraph 48 states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 1.4 Paragraph 49 specifies that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable sites.

##### **NATIONAL PLANNING PRACTICE GUIDANCE (NPPG) (March 2014)**

- 1.5 The NPPG specifies that housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight information provided in the latest full assessment of housing needs should be considered.
- 1.6 Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites. Demonstration of a five year supply is a key material consideration when determining housing applications and appeals.

##### **LONDON PLAN (2015)**

- 1.7 The London Plan para 3.14A and Policy 3.3 specifies that minimum housing supply targets for each borough are set out from 2015 until 2025. For Bromley Borough, this target is 641 dwellings per annum. These targets are informed by the GLA's Strategic Housing Market Assessment (SHMA) (2013) and London's housing land capacity as identified through the 2013 GLA Strategic Housing Land Availability Assessment (SHLAA). Consistent with the NPPF this approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development. Paragraph 3.17 sets out that on the supply side, the London

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SHLAA is designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework' (para. 47 NPPF) not least its central dictum that resultant development must be sustainable.

- 1.8 The SHLAA methodology is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. The methodology has been developed and refined over time through partnership working with boroughs and others involved in London housing as well as to reflect the principles of government guidance on preparation of SHLAAs nationally (2007 practice guidance).
- 1.9 The London Plan (para 3.19A) observes that national policy requires boroughs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their requirements with an additional buffer of 5% moved forward from later in the plan period. In compiling their 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses and the London SHLAA's evidence, it must be recognised that in addressing this national objective, capacity which elsewhere in the country would be termed "windfall" must here form part of the 5 year supply. In order to support the range of activities and functions required in London as set out in this Plan application of the 5% - 20% buffers should not lead to approval of schemes which compromise the need to secure sustainable development as required in the NPPF (paragraph 3.19A).

### **2.0 LONDON BOROUGH OF BROMLEY FIVE YEAR HOUSING SUPPLY**

- 2.1 This paper sets out Bromley's position on five year supply (01/04/15-31/03/20).
- 2.2 Policy H1 of the Adopted Unitary Development Plan (2006) deals with housing supply (11,450 units) over a period of 1997-2016. This period originates from the GLA London Housing Capacity Study (2000). The Study has been superseded by three other Assessments based on 10 year periods and incorporated into the London Plan (2008, 2011 and 2015). It is considered that the current London Plan (2015) is the most up to date Plan to take into consideration for housing supply targets and reference to a 20 year period for monitoring purposes is no longer relevant.<sup>1</sup>
- 2.3 An annual housing target figure of 485 units applied to the Borough from 2007/08 – 2010/11 as a result of the Borough participating in the 2005 London Housing Capacity Study.
- 2.4 The Council contributed to the London-wide SHLAA / Housing Capacity Study (SHLAA, 2009). As a result of the Assessment an annual housing monitoring target of 500 units was allocated to the Borough in the 2011 London Plan for the plan period 2011/12 – 2020/21. The Council also contributed to the GLA's SHLAA 2013 which assigned an annual housing monitoring target of 641 units to the Borough and has been adopted through the 2015 London Plan (consolidated with alterations since 2011). The 2013 SHLAA shows that the basis for the increased target from 500 to 641 per annum for Bromley is comprised of small sites.
- 2.5 The 2009 SHLAA attributed a small site capacity of 195 units out of an overall target of 500 units for the Borough. This figure increased to 352 units out of an overall target of 641 units within the 2013 SHLAA resulting in a 157 increase in small site capacity based on historic delivery rates, by comparison with an overall increase in the target of 141.

### **Current housing provision targets and delivery**

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<sup>1</sup> GLA advise (Jan 2011) that targets from previous plan periods do not accrue.

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2.6 Table 1 below illustrates that housing completions have exceeded the current annual target (2007 – 2013) and are in excess of the cumulative target by 859 units. In light of this delivery it is considered that a buffer of 5% is relevant.

<b>Financial Year</b>	<b>Completions (units)</b>	<b>Cumulative Completions</b>	<b>Cumulative Target</b>
2007/08	713	713	485
2008/09	494	1207	970
2009/10	553	1760	1455
2010/11	672	2432	1940
2011/12	566	2998	2440
2012/13	646	3644	2940
2013/14	605	4249	3440
2014/15	550 (Est)	4799	3940

Table 1 Completions 2007/08-2014/15

2.7 Table 2 sets out the Borough's position on housing delivery against the current ten year target (2015/16 – 2024/25). During the five year supply period Table 2 shows that the Borough needs to deliver 3205 units.

2.8 Completions known to date for 2014/15 are in the region of 450 units on sites of 9 units and larger. Therefore an estimate of 550 units for the year is considered reasonable and likely to be exceeded.

<b>Financial Year</b>	<b>Completions needed</b>	<b>Cumulative Target</b>
2015/16 – 2019/20	3205	3205
2020/21	641	3846
2021/22	641	4487
2022/23	641	5128
2023/24	641	5769
2024/25	641	6410

Table 2 Housing Targets LB Bromley 2015/16 – 2024/25

2.9 The 5% buffer would increase the five year figure from 3205 units to 3365 units.

### **Five year supply position**

2.10 The following sites make up Bromley's five year supply (based on units available and not whole sites) and are set out in Appendix 1 to this paper:

- a) Large (0.25 ha+) with planning permission and small sites approach;
- b) Large and small sites that have commenced;
- c) Relevant large identified sites;
- d) Other large known sites;
- e) Long term vacant units brought back into use;
- f) Sites granted prior approval.

#### a) Large with planning permission and small sites approach

2.10 Under the London Plan / 2013 SHLAA small sites are those <0.25ha and large sites are those >0.25ha.

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- 2.11 Sites of 9+ units were assessed to determine if they would be deliverable over the five year period. Where relevant, developers/agents were contacted to establish if sites were likely to be brought forward or if a start date was known. In some cases developers were able to confirm that work had already started on site or was imminent. If sites were unlikely to be pursued within the five year timescale they were removed from the list. Relevant sites are listed in Appendix 1.
- 2.12 As part of the London-wide SHLAA 2013 an assessment was made of the contribution that small sites (<0.25ha) have made to housing delivery within each borough from 2004/05 – 2011/12. The figure was derived by taking an average of small site completions (new build, conversions and changes of use) 2004/05 – 2011/12 and removing 90% of new build completions built on garden land. The annual average figure for the Borough during this time period was 352 units. Over the ten year London Plan period (2015/16 – 24/25) the small site windfall figure could contribute 3520 units and over five years 1760 units. The London-wide SHLAA 2013 forms part of the evidence supporting the recently updated London Plan (2015). Paragraph 1.9 above sets out the London Plan approach to including ‘windfall’ sites within boroughs five year housing supply papers.
- 2.13 It is considered that delivery on small sites is not insignificant and has been demonstrated over the relevant eight year period. The small sites allowance within the five year housing supply is based on London Plan (2015) evidence within the 2013 SHLAA as endorsed by the Inspector into the examination of the Further Alterations to the London Plan. The inclusion of approximately 1757+632 units, as set out in Appendix 1, over five years is deliverable and takes into account advice set out in paragraph 48 of the NPPF and paragraph 3.19A of the London Plan. Of importance is the fact that nearly over one third of these sites are identified and include:

<b>Small sites</b>	<b>No. of units</b>
Units with planning permission or commenced	190
Allocated	10
Office to residential PD granted (9+ units)	<u>15479</u>
Office to residential PD commenced (9+ units)	<u>8838</u>
Site <9 units and <0.25 ha commenced (includes 50 office to residential units)	170
Other known sites	45
Future delivery of other small sites with planning permission	1100
<b>TOTAL</b>	<b><u>1757+632</u></b>

Table 3: Small sites included within five year housing supply

### b) Sites that have commenced

- 2.14 Sites that have started are considered deliverable over the five year supply period. Any large completed sites were removed from the list in addition to units on uncompleted large sites (up to March 2015).
- 2.15 There are approx. 170 units on small sites that have started and it is expected that these will be delivered by the end of the five year supply period (includes office to residential PD units).

### c) Large identified sites

- 2.16 Site B within the Bromley Area Action Plan (BAAP, adopted October 2010) was included in the 2013 SHLAA results for Phase 2 of the Assessment. The BAAP states the site could accommodate 70 residential units on site. It is considered that 40 units could be deliverable in the five year period.
- 2.17 Development at Site K (Westmoreland Road) including 200 residential units was granted planning permission in March 2012 and work has commenced on site.



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2.18 Site C within the BAAP was included in the 2013 SHLAA results for Phase 3 (2020 – 2025) of the Assessment. The BAAP states that the site could accommodate around 20 units. There is a possibility that this site may be delivered during an earlier phase, therefore an estimate of 20 units has been attributed to the five year housing supply.

### d) Other known sites

2.19 Other known sites that are considered deliverable are included in Appendix 1. These include 2 sites that have been granted planning permission but are awaiting the finalisation of Section 106 agreements (57 Albemarle Road, Beckenham and 165 Masons Hill, Bromley), and an additional site (Sundridge Park Manor) where a previous planning permission has expired but an amended scheme is pending consideration.

### e) Long term empty homes (longer than 6 months) returning to use

2.17 The GLA advise that long term empty homes returning to use can be included in calculating completion targets for boroughs. The 2013 GLA SHLAA attributes an annual target to some boroughs in relation to reducing long term vacant properties (6 months+) to 0.75% of overall stock. The percentage of long term vacant units within the borough is less than 0.75% and therefore a target has not been allocated. Importantly though any long term vacant properties that are brought back into use can still count towards annual completion data. GLA Annual Monitoring Data on vacant units is compiled using DCLG Live Table 615 (Live tables on dwelling stock including vacants). On average since 2004 approximately 88 long term vacant units have been returned to use per annum. It is considered that the overall long term vacant figure for the borough has declined significantly over this period (2004, 1506 units; 2013, 709 units) but a conservative allocation of 100 units over the five year period would be reasonable.

### f) Changes of use from office to residential

2.14 The Government introduced Regulations in May 2013 to extend permitted development rights allowing for a change of use from B1(a) to C3 subject to a prior approval process up to May 2016. A minimum of 454310 units have been approved through this process up to March 2015 and approximately 14090 units have commenced and are included in Appendix 1 of this Paper.

2.15 It is considered that during the five year housing supply period an estimated delivery of an additional 150250 units would be reasonable. To date there are approximately 60 units in this category that have commenced and/or have building control notices accepted and have not been counted elsewhere in the five year housing supply. There are approximately 100 units submitted through the prior approval process that are currently pending a decision.

2.16 Contributions from this source up to the end of May 2016 are likely to include large and small sites.

### Conclusion to date

2.23 The Council's five year housing supply position will be monitored and updated on a regular basis.

2.24 The sites listed in Appendix 1 are considered to be deliverable within the five year housing supply period.

2.25 Appendix 1 illustrates that Bromley is able to meet its five year supply target of 3365 units (including the 5% buffer) given that there are 34653440 deliverable units in the pipeline. In light of this, regard will be had to policies in the London Plan, the Bromley Development Plan, the NPPF, the NPPG and other material considerations when assessing new planning applications.

### Summary of five year housing supply

**APPENDIX ONE**

<b>Five year housing supply capacity</b>		<b>Five year housing supply targets</b>
Known sites with planning permission not commenced	<del>795720</del>	Target of 641 units per annum x 5 = 3205 units
Known sites commenced (up to end March 2015)	<del>1021971</del>	3205 units plus 5% buffer = <b>3365 units</b>
Allocated sites	70	
Other known sites	59	
Small sites started (including prior approval)	170	
Small sites allowance	1100	
B1(a) to C3 Prior Approval allowance	<del>150250</del>	
Vacant units brought back into use	100	
<b>TOTAL</b>	<del><b>34653440</b></del>	
Conclusion: Five year housing supply exceeds target of 3365 units		

**Appendix 1**

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**FIVE YEAR HOUSING LAND SUPPLY 01/04/15 to 31/03/20**

Borough Reference	Net Gain Excluding unit comp.	Site Area (ha)	Site Size	Site Address		Post Code	Ward	Current Permission Status	Date of PP
<b>Sites with permission not commenced</b>									
<i>14/00449/RESPA</i>	<i>75</i>	<i>0.12</i>	<i>Small</i>	<i>County House</i>	<i>221-241 Beckenhalm Road</i>	<i>BR34 UF</i>	<i>CLOCKHOUSE E</i>	<i>Not started</i>	<i>28/03/2014</i>
13/03889/FULL1	16	0.18	Small	The Rising Sun	166 Upper Elmers End Road	BR3 3DY	KELSEY AND EDEN PARK	Not started	09/04/2015
14/03316/FULL1	83	0.2	Small	Orpington Police Station	The Walnuts Orpington	BR6 0TW	ORPINGTON	Not started	17/04/2015
14/02086/RESPA	79	0.1	Small	Berwick House	8 - 10 Knoll Rise	BR6 0E	ORPINGTON	Not started	14/11/2014
12/01843/FULL1	9	0.4	Large	20-22	Main Road	TN16 3EB	BIGGIN HILL	Not started	04/06/2013
13/03467/FULL1	74	0.28	Large	Dylon International Ltd	Worsley Bridge Road	SE26 5HD	COPERS COPE	Not started	16.02.2015
14/00820/OUT	45	1.09	Large	Grays Farm Production Village	Grays Farm Road	BR5 3BD	CRAY VALLEY WEST	Not started	12/03/2015
14/03991/FULL1	46	1.4	Large	The Haven	Springfield Road		CRYSTAL PALACE	Not started	31/03/2015
14/03236/RESPA	12	2.5	Large	Bassetts House	Broadwater Gardens	BR6 7UZ	FARNBOROUGH AND CROFTON	RESPA GRANTED	15/10/2014
14/01873/FULL1	21	0.57	Large	Isard House	Glebe House Drive		HAYES AND CONEY HALL	Not started	10/12/2014
14/02364/FULL1	23	2.6	Large	Hayes Court	West Common Road		HAYES AND CONEY HALL	Not started	17/12/2014
12/00976/OUT	179	10.6	Large	GlaxoSmithKline Langley Court	South Eden Park Road	BR3 3BS	KELSEY AND EDEN PARK	Not started	17/06/2014
13/00905/OUT	38	0.4	Large	25	Scotts Road	BR1 3QD	PLAISTOW AND SUNDRIDGE	Not started	11/06/2014
12/03606/FULL1	41	2.27	Large	Sundridge Park Management Centre Ltd	Plaistow Lane	BR1 3TP	PLAISTOW AND SUNDRIDGE	Not started	06/11/2013
14/03324/FULL1	54	0.5	Large	Summit House	Glebe Way	BR4 0RJ	WEST WICKHAM	Not started	02/04/2015
<b>Total</b>	<b>795720</b>								
<b>Sites Commenced</b>									

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Borough Reference	Net Gain Excluding unit comp.	Site Area (ha)	Site Size	Site Address		Post Code	Ward	Current Permission Status	Date of PP
13/02222/RESPA	27	0.2	Small	Archers Court	48 Masons Hill	BR2 9JG	BROMLEY TOWN	Started	08/09/2013
<i>14/04850/RESPA</i>	<i>50</i>	<i>0.19</i>	<i>Small</i>	<i>Title House</i>	<i>33-35 Elmfield Road</i>	<i>BR1 1LT</i>	<i>BROMLEY TOWN</i>	<i>Started</i>	<i>10/02/2015</i>
14/01932/RESPA	11	0.05	Small	Babbacombe House, 2	Babbacombe Road	BR1 3LW	BROMLEY TOWN	Started	12/05/2014
10/02346/FULL1	9	0.11	Small	125	Park Road	BR3	COPERS COPE	Started	07/09/2011
12/00304/FULL1	50	0.23	Small	76	High Street	BR6 0JQ	CRAY VALLEY EAST	Started	06/02/2013
12/03859/FULL1	9	0.13	Small	193	Anerley Road	SE20 8EL	CRYSTAL PALACE	Started	26/03/2013
04/03547/FULL1	10	0.01	Small	Fair Acres Estate	Fair Acres	BR2 9BL	HAYES AND CONEY HALL	Started	21/01/2005
09/00422/FULL1	13	0.1	Small	Plaistow Lane Service Station	Plaistow Lane	BR1 4DS	PLAISTOW AND SUNDRIDGE	Started	11/11/2009
11/01412/FULL1	4	0.26	Large	49	Sunningvale Avenue	TN16 3BX	BIGGIN HILL	Started	21/07/2011
07/03632/FULL1	160	0.27	Large	Land At South Side Of	Ringers Road	BR1 1HP	BROMLEY TOWN	Started	04/01/2008
11/03865/FULL1	200	0.96	Large	Site K Multistorey Car Park	Simpsons Road	BR1	BROMLEY TOWN	Started	26/03/2012
03/02319/OUT and 10/00740/DET	155	12	Large	Blue Circle Sports Ground	Crown Lane	BR2 9PQ	BROMLEY COMMON AND KESTON	Started	22/11/2007
03/04554/FULL1	6	0.26	Large	Maunsell House, 160	Croydon Road	BR3 4DE	CLOCK HOUSE	Started	26/02/2009
12/00102/FULL1	42	0.9	Large	Graham Chieseman House	St Pauls Cray Road	BR7 6QA	CHISLEHURST	Started	26/06/2013
09/01664/FULL1	149	0.28	Large	Dylon International Ltd	Worsley Bridge Road	SE26 5HD	COPERS COPE	Started	15/04/2010
11/02100/FULL1	44	0.35	Large	Land Rear of 86-94	High Street	BR3	COPERS COPE	Started	26/07/2012
11/02140/OUT	33	2.04	Large	Part Of Kent County Cricket Ground	Worsley Bridge Road	BR3 1RL	COPERS COPE	Started	29/03/2012
07/04649/DET	5	0.7	Large	Anerley School For Boys	Versailles Road	SE20 8AX	CRYSTAL PALACE	Started	10/03/2008
13/01670/FULL1	-12	0.78	Large	1	Chilham Way	BR2 7PR	CRYSTAL PALACE	Started	13/03/2014
12/02443/FULL1 and 12/02913/FULL2	56	0.95	Large	Holy Trinity Convent School	Plaistow Lane	BR1 3LL	PLAISTOW AND SUNDRIDGE	Started	07/11/2011

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Borough Reference	Net Gain Excluding unit comp.	Site Area (ha)	Site Size	Site Address		Post Code	Ward	Current Permission Status	Date of PP
<b>Total</b>	<b>1021971</b>								
<b>Allocated sites</b>									
UDP Proposal Site	10	0.01	Small	Land adjacent Clock House station			CLOCKHOUS E		
Bromley Area Action Plan	40	0.37	Large	Site B Tweedy Road/London Road			BROMLEY TOWN		
Bromley Area Action Plan	20	0.7	Large	Site C Former Town Hall and South Street Car Park			BROMLEY TOWN		
<b>Total</b>	<b>70</b>								
<b>Other sites</b>									
14/01637/FULL1	16	0.16	Small	57	Albemarle Road	BR3 5HL	COPERS COPE	SUBJECT TO S106	
14/04199/FULL1	29	0.13	Small	165 Masons Hill		BR2 9HW	BROMLEY TOWN	SUBJECT TO S106	
14/02683/FULL3	14	3	Large	Sundridge Park Manor	Willoughby Lane	BR1 3FZ	PLAISTOW AND SUNDRIDGE	PCO	
<b>Total</b>	<b>59</b>								
<b>Small sites started</b>									
	170		Small	Various			BOROUGH-WIDE		
<b>Small sites allowance</b>									
	1100		Small	Various			BOROUGH-WIDE		
B1(a) to C3 Prior Approval Sites allowance							BOROUGH-WIDE		
	<b>150250</b>						BOROUGH-WIDE		
Vacant Units	100						BOROUGH-WIDE		
<b>OVERALL TOTAL</b>	<b>34653440</b>								

Subdivision of small and large sites set out above	
Small Sites	<b>16321757</b>
Large Sites	<b>14581458</b>
Prior Approval and Vacant Units	<b>250350</b>
<b>TOTAL</b>	<b>34653440</b>