

LB BROMLEY FIVE YEAR SUPPLY OF HOUSING

FIVE YEAR SUPPLY OF DELIVERABLE LAND FOR HOUSING (September 2014)

1.0 GOVERNMENT 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.

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG) (MARCH 2014)

- 1.4 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 Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight information provided in the latest full assessment of housing needs should be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.
- 1.5 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.

2.0 LONDON BOROUGH OF BROMLEY FIVE YEAR SUPPLY

- 2.1 This paper sets out Bromley's position on five year supply (01/04/14-31/03/19).
- 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 Draft Further Alterations to the London Plan 2014). It is considered that the current London Plan (2011) 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.¹

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

- 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 Strategic Housing Land Availability Assessment / 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 adopted London Plan (July 2011) for the plan period 2011/12 – 2020/21. The Council also contributed to the GLA's Strategic Housing Land Availability Assessment 2013 which forms part of the evidence base for the Mayor's London Plan and has informed the DFALP (2014). This Assessment has assigned a draft annual housing monitoring target of 641 units to the Borough. Until any Alterations are formally adopted the current target of 500 units per annum will be used for the purposes of this Paper.

Current housing provision targets and delivery

- 2.5 Table 1 below illustrates that housing completions have exceeded the current annual target (2007 – 2013) and are in excess of the cumulative target by 666 units. In light of this delivery it is considered that a buffer of 5% is relevant.

Financial Year	Completions (units)	Cumulative Completions	Cumulative Target
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

Table 1 Completions 2007/08-2012/13

- 2.6 Table 2 sets out the Borough's position on housing delivery against the current ten year target (2011/12-2020/21). During the five year supply period Table 2 shows that the Borough needs to deliver approximately 2277 units (taking into account previous completions). The excess of completions for 2011/12 – 2013/14 has been spread throughout the remaining seven years of the Plan period.
- 2.7 Completions known to date for 2013/14 are in the region of 500 units on large sites (9 units and larger). Therefore an estimate of 600 units for the year is considered reasonable and likely to be exceeded.

Financial Year	Completions	Cumulative Completions to date	Cumulative Target
2011/12	566	566	500
2012/13	646	1212	1000
2013/14	600(est)*	1812	1500
2014/19	2277		4000
2019/20	-		4500
2020/21	-		5000

Table 2 Housing Targets LB Bromley 2011/12 – 2020/21 *estimate based on completions for 2013/14 known to date

- 2.8 The 5% buffer would increase the five year figure from 2277 units to 2391 units.

Five year supply position

- 2.9 The following sites make up Bromley's five year supply (based on units available and not whole sites) and are set out in Annex 1 to this paper:
- a) Large (9 units+) with planning permission and small sites;

- b) Large and small sites that have commenced;
- c) Relevant large identified sites.

a) Large Sites with planning permission and Small Sites

- 2.10 Sites 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.
- 2.11 There are approximately 355 units on small sites (<9 units) in the pipeline that have not commenced. From 04/05 to 13/14, on average planning permission was granted for approximately 270 units per annum on these sites and completions on average have been in the region of over 230 units per annum. Over the past nine years, on average, delivery on small sites has typically accounted for around 36% of completions overall.
- 2.12 It is considered that delivery on small sites is not insignificant and has been demonstrated over the past eight years. Therefore an allowance of 500 units over five years is likely to be deliverable and takes into account advice set out in paragraph 48 of the NPPF.
- 2.13 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. Over 200 units have been approved through this process up to July 2014. It is considered that during the five year housing supply period an estimated delivery of 150 units would be reasonable.

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

- 2.14 The GLA advise that long term empty homes returning to use can be included in calculating completion targets for boroughs. During the Plan period to date 38 units in the Borough have been brought back into use (GLA Annual Monitoring Reports 11/12 and 12/13). An estimate of a total 50 units for the five year period has been included in Annex 1.

c) Sites that have commenced

- 2.15 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 mid May 2014).
- 2.16 There are 152 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.

c) Large identified sites

- 2.17 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.
- 2.18 Development at Site K (Westmoreland Road) including 200 residential units was granted planning permission in March 2012 and is included in Annex 1 of this report.
- 2.19 Site L within the BAAP was included in the 2013 SHLAA results for Phases 2 and 3 of the Assessment (approximately 48 units). Negotiations are on-going for the site and it is anticipated that within the five year supply period approximately 70 units could now be deliverable.
- 2.20 Within the BAAP the Civic Centre site includes an allocation of 20 dwellings and a conservative estimate of 18 dwellings is shown in the 5 year supply.

Conclusion to date

- 2.21 The Council's five year housing supply position will be monitored and updated on a regular basis.
- 2.22 Appendix 1 illustrates that Bromley is able to meet its five year supply target of 2391 units (including the 5% buffer) given that there are 2456 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.

ANNEX (1)

Borough Reference	Net Gain Excluding unit completions	Site Address		Post Code	Ward	Current Permission Status	Permission Date
Sites with permission not commenced							
12/01843/FULL1	9	20-22	Main Road	TN16 3EB	BIGGIN HILL	Not started	04/06/2013
10/02964/FULL1	19	57	Albemarle Road	BR3 5HL	COPERS COPE	Not started	14/02/2012
10/02346/FULL1	9	125	Park Road	BR3	COPERS COPE	Not started	07/09/2011
11/03762/OUT	8	North Orpington Pumping Station	East Drive	BR5 2BH	CRAY VALLEY EAST	Not Started	30/05/2013
13/01670/FULL1	-12	1	Chilham Way	BR2 7PR	CRYSTAL PALACE	Not started	13/03/2014
12/03859/FULL1	9	193	Anerley Road	SE20 8EL	CRYSTAL PALACE	Not started	26/03/2013
13/02545/EXTEND	8	1	Maple Road	SE20 8EX	PENGE AND CATOR	Not started	25/09/2013
11/03600/FULL3	8	2-4	Raleigh Road	SE20 7JB	PENGE AND CATOR	Not started	13/03/2014
12/02049/OUT	8	44-45	Green Lane	SE20 7JX	PENGE AND CATOR	Not started	12/09/2012
11/01181/EXTEND and 11/01989/	14	Sundridge Park Manor	Willoughby Lane	BR1 3FZ	PLAISTOW AND SUNDRIDGE	Not started	04/10/2011
07/02483/FULL1	41	Sundridge Park Management Centre Ltd	Plaistow Lane	BR1 3JW	PLAISTOW AND SUNDRIDGE	Not started	09/10/2007
12/02695/DET	9	51	Palace Road	BR1 3JU	PLAISTOW AND SUNDRIDGE	Not started	16/01/2013
13/00905/OUT	38	25	Scotts Road	BR1 3QD	PLAISTOW AND SUNDRIDGE	Not started	11/06/2014
Sites Commenced							
11/01412/FULL1	4	49	Sunningvale Avenue		BIGGIN HILL	Started	21/07/2011
03/02319/OUT and 10/00740/DET	235	Blue Circle Sports Ground	Crown Lane	BR2 9PQ	BROMLEY COMMON AND KESTON	Started	22/11/2007
11/03865/FULL1	200	Site K Bromley Area Action Plan' Multistorey Car Park Simpsons Road		BR1	BROMLEY TOWN	Started	26/03/2012
07/03632/FULL1	160	Land At South Side Of	Ringers Road	BR1 1HP	BROMLEY TOWN	Started	04/01/2008
11/01958/EXTEND	8	14	Highland Road	BR1 4AD	BROMLEY TOWN	Started	08/08/2011
12/03385/FULL1	20	Sheila Stead House	Bushell Way	BR7 6SF	CHISLEHURST	Started	30/05/2013
12/00102/FULL1	42	Graham Chieseman House	St Pauls Cray Road	BR7 6QA	CHISLEHURST	Started	26/06/2013
07/03764/DET	4	Ravensbourne College Of Design & Communication	Walden Road	BR7 5SN	CHISLEHURST	Started	14/01/2008

Borough Reference	Net Gain Excluding unit completions	Site Address		Post Code	Ward	Current Permission Status	Permission Date
03/04554/FULL1	58	Maunsell House, 160	Croydon Road	BR3 4DE	CLOCK HOUSE	Started	26/02/2009
	44	Land Rear of 86-94	High Street	BR3	COPERS COPE	Started	26/07/2012
11/02140/OUT	48	Part Of Kent County Cricket Ground	Worsley Bridge Road	BR3 1RL	COPERS COPE	Started	29/03/2012
11/00701/OUT	28	Adjacent 7	Fordcroft Road	BR5 2DA	CRAY VALLEY EAST	Started	30/03/2012
12/00304/FULL1	50	76	High Street	BR6 0JQ	CRAY VALLEY EAST	Started	06/02/2013
10/03698/FULL1	-14	Alkham Tower	Bapchild Place	BR5 3PL	CRAY VALLEY EAST	Started	02/11/2011
12/02658/FULL1	41	Chipperfield Day Centre	Chipperfield Road	BR5 2PY	CRAY VALLEY WEST	Started	19/02/2013
07/04649/DET	29	Anerley School For Boys	Versailles Road	SE20 8AX	CRYSTAL PALACE	Started	10/03/2008
12/03634/FULL1	24	2	Betts Way	SE20 8TZ	CRYSTAL PALACE	Started	01.03.2013
04/03547/FULL1	10	Fair Acres Estate	Fair Acres	BR2 9BL	HAYES AND CONEY HALL	Started	21/01/2005
09/02956/DET	3	12-14	Kemerton Road	BR3 6NJ	KELSEY AND EDEN PARK	Started	26/01/2010
12/02443/FULL1 and 12/02913/FULL2	56	Holy Trinity Convent School	Plaistow Lane	BR1 3LL	PLAISTOW AND SUNDRIDGE	Started	07/11/2011
09/00422/FULL1	13	Plaistow Lane Service Station	Plaistow Lane	BR1 4DS	PLAISTOW AND SUNDRIDGE	Started	11/11/2009
Allocated sites							
UDP PROP SITE	10	Land adjacent Clock House station			CLOCK HOUSE		
Bromley Area Action Plan	40	Site B Tweedy Road			BROMLEY TOWN		
Bromley Area Action Plan	70	Sites L DHSS Building Westmoreland Road			BROMLEY TOWN	Permission subject to S106	
Bromley Area Action Plan	18	Civic Centre			BROMLEY TOWN		
Other sites							
12/00776/OUT	56	Grays Farm Production Village	Grays Farm Road	BR5 3BD	CRAY VALLEY WEST	Permission subject to S106	
12/00976/OUT	179	GlaxoSmithKline Langley Court	South Eden Park Road	BR3 3BS	KELSEY AND EDEN PARK	Permission subject to S106	
Small sites started from 01/01/11							
	152				BOROUGH-WIDE		
Small sites with planning permission							

Borough Reference	Net Gain Excluding unit completions	Site Address		Post Code	Ward	Current Permission Status	Permission Date
	500				BOROUGH-WIDE		
B1(a) to C3 Prior Approval Sites							
	150				BOROUGH-WIDE		
Long term empty properties returning to use							
	50				BOROUGH-WIDE		
OVERALL TOTAL	2456						