

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 Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight information provided in the latest full assessment of housing needs should be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

## APPENDIX ONE

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.

## APPENDIX ONE

- 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:
- Large (0.25 ha+) with planning permission and small sites approach;
  - Large and small sites that have commenced;
  - Relevant large identified sites;
  - Other large known sites;
  - Long term vacant units brought back into use;
  - 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.

## APPENDIX ONE

- 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.

## APPENDIX ONE

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	<u>795720</u>	Target of 641 units per annum x 5 = 3205 units
Known sites commenced (up to end March 2015)	<u>1021971</u>	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	<u>150250</u>	
Vacant units brought back into use	100	
<b>TOTAL</b>	<u><b>34653440</b></u>	
Conclusion: Five year housing supply exceeds target of 3365 units		

Appendix 1

APPENDIX ONE





## APPENDIX ONE

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

**APPENDIX ONE**

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>