London Borough of Bromley
Five Year Housing Land Supply November 2016

LB BROMLEY FIVE YEAR SUPPLY OF HOUSING

FIVE YEAR SUPPLY OF DELIVERABLE LAND FOR HOUSING (5YHLS, November 2016)

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 in footnote 11 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, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."
- 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 Section 8 of the PPG states that "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. However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of five-year supply. LPAs will need to provide robust, up-to-date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out (ID 3-031).
- 1.7 Local planning authorities should ensure that they carry out their annual assessment in a robust and timely fashion, based on up-to-date and sound evidence taking into account the anticipated trajectory of housing delivery and consideration of associated risks and an assessment of the local delivery record (ID 3-033).
- 1.8 Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt. (ID 3-034)
- 1.9 With regard to housing delivery the PPG specifies that the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle (ID 3-035).

LONDON PLAN (2015, 2016)

- 1.10 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). The GLA SHLAA 2013 forms part of the evidence supporting the recently updated London Plan (2015, 2016). 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 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.
- 1.11 The Inspector's report for the Examination into the Further Alterations to the London Plan (2014) specified that there is a need for housing above the targets set out in Table 3.1 of the London Plan. Policy 3.3 of the London Plan and subsequent new policies seek to ensure the delivery of suitable sites. Policy 3.3B of the London Plan, 'Increasing Housing Supply', states that the Mayor will seek to ensure housing need identified in paragraphs 3.16a and 3.16b is met through providing at least an annual average of 42,000 net additional homes per annum across London. Paragraph 3.17A of the London Plan refers to Table 3.1, which shows that over the period 2015 to 2025, London has capacity for at least 420,000 additional homes, or 42,000 per annum.

- 1.12 Policy 3.3Da states that boroughs should draw on housing benchmarks in Table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF. Policy 3.3E sets out that boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets, having regard to the other policies of this Plan and, in particular, the potential to realise brownfield housing capacity. The GLA's Supplementary Planning Guidance on Housing (2016) sets out advice on the use of targets in Local Plans (para 1.1.3) and 'Reconciling local and strategic housing need' (paras 1.1.4 1.1.8).
- 1.13 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).
- 1.14 Evidence was provided to the Examination into the Further Alterations to the London Plan (2014) in relation to the increased small site target for the Borough. It was considered by Bromley Council that the small site target uplift was too high and not sustainable over time. This evidence was not accepted and the relevant small site target for the Borough was 352 units per annum based on the 2013 SHLAA for the period 2015-2025 when the Further Alterations were adopted in 2015.
- 1.15 Paragraph 1.1.28 of the GLA's Housing SPG (2016) states that the SHLAA provides the compelling evidence necessary to justify a windfall allowance for small sites based on historic trends, in line with paragraph 48 of the NPPF and reflecting distinct circumstances in London. It also states that trends show housing has been consistently delivered on small sites in the past and that this can be expected to provide a reliable source of future supply.
- 1.16 Paragraph 1.1.29 states that average annual trends (2004/05 2011/12) provide a consistent and appropriately long-term basis on which to estimate future supply, not least because they cover a full market cycle and take account of the impact of the recession. Trends also reflect particular local circumstances, for example, environmental/heritage designations and urban form. These specific points, together with the overall robustness of the SHLAA's capacity estimates for small sites, were tested through an EiP and were accepted in the Planning Inspector's Report on the 2015 London Plan. Boroughs are encouraged to re-examine the potential capacity from small sites and explore policy approaches which may lead to the delivery of more homes on small sites where consistent with the Plan. However, the EiP Inspector stated that boroughs would be in conformity with the London Plan if they met their London Plan Table 3.1 target.

2.0 LONDON BOROUGH OF BROMLEY FIVE YEAR HOUSING SUPPLY

2.1 This paper sets out Bromley's position on five year supply (01/04/16-31/03/21).

Background

- 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 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
- 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 study, 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 in the 2015 London Plan (consolidated with alterations since 2011).
- 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. The monitoring period for the target of 641 units commenced in 2015/16.
- 2.6 The Council's Five Year Housing Supply position is usually updated annually to set out the housing delivery position. Through the Local Plan process, the Borough is continuing to seek to identify suitable sites for housing, taking into account the minimum target figure for the Borough of 641 units per annum. The consultation on Draft Allocations, further policies and designations (September 2015) assessed sites that had been suggested to date to the Council as part of previous consultations (including a call for sites in February 2014). A number of draft sites have been recommended for allocation (including residential and mixed uses) and representations on the September 2015 document have been considered and were reported to Members in July 2016.
- 2.7 Further consideration of housing supply numbers has been undertaken following receipt of a planning appeal decision in August 2016 (APP/G5180/W/16/3144248) relating to the Council's Five Year Housing Supply Paper (June 2015). This has fed into the Council's Proposed Submission Draft Local Plan (November 2016) and the 5YHLS (November 2016). The main outstanding five year housing land supply issues that were considered in the appeal included; a small number of specific sites, the small site allowance methodology and the relevance of incorporating a lapse rate to sites with planning permission not commenced. Of importance to this Paper are the changes that have been

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

made to the small site allowance methodology that is set below in paragraphs 2.14 – 2.18 and the appropriateness of including a lapse rate (to sites with planning permission not commenced). Paragraph 2.1.21 of the Council's Proposed Submission Draft Local Plan November 2016 makes reference to 'Risk Assessment for Housing Land Delivery' in the Borough and sets out that in practice, large site windfalls in policy compliant locations do come forward, and reduce the risk of underachievement in housing delivery. Furthermore, the NPPF requirement is for 'deliverability' which includes a degree of uncertainty. The application of a lapse rate is therefore not considered necessary to deliverable sites within the 5YHLS.

Current housing provision targets and delivery

2.8 Table 1 below illustrates that housing completions have exceeded annual targets (2007 – 2015) and are in excess of the cumulative target by approximately 900 units. In light of this, it is considered that a buffer of 5% is relevant.

	Small sites	Large Sites	Annual target	Cumulative target	Total	Cumulative total
2007/08	370	343	485	485	713	713
2008/09	369	136	485	970	505	1218
2009/10	246	312	485	1455	558	1776
2010/11	309	452	485	1940	761	2537
2011/12	385	261	500	2440	646	3183
2012/13	234	292	500	2940	526	3709
2013/14	170	515	500	3440	685	4394
2014/15	158	259	500	3940	417	4811
2015/16	254	419	641	4581	673	5484

Table 1 Completions 2007/08-2015/16

2.9 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 3173 units.

Financial Year	Completions needed or delivered	Cumulative Target
2015/16	673	641
2016/17 – 2020/21	3173	3846
2021/22	641	4487
2022/23	641	5128
2023/24	641	5769
2024/25	641	6413

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

2.10 A 5% buffer would increase the five year figure from 3173 units to 3332 units.

Five Year Supply Position

- 2.11 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 and draft allocated sites;
 - d) Long term vacant units brought back into use;
 - e) Sites granted prior approval.

a) Large with planning permission and small sites approach

- 2.12 Under the London Plan / 2013 SHLAA small sites are those <0.25ha and large sites are those >0.25ha.
- 2.13 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. Relevant sites are listed in Appendix 1.
- 2.14 An assessment has been made of the contribution that small sites (<0.25ha) have made to housing delivery from 2008/09 2015/16. The figure was derived by taking an average of small site completions (new build, conversions and changes of use) during the period and removing 90% of new build completions built on garden land. The latter methodology largely reflects that used in the 2013 SHLAA but uses more up to date small site completion data. The methodology is explained in paragraph 2.69 2.72 (pages 38-39) of the SHLAA.
- 2.15 At the time of undertaking the 2013 SHLAA permitted development rights relating to the change of use from office to residential had only recently been introduced so did not factor in the methodology. The data used to calculate the small site allowance included approximately 90 unit completions from 2014/15 to 2015/16. It is considered that the role of the permitted development rights and their contribution to future housing supply will be included in some form within the next GLA SHLAA. In light of the fact that the rights have now been made permanent and only a conservative allowance has been included in the 5YHLS (see paragraphs 2.33-2.35) the inclusion of the 90 units within the calculation is considered justified.
- 2.16 Delivery on small sites is not insignificant and has been demonstrated over the eight year period. The small sites allowance is largely 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 730 units, as set out in Appendix 1, over five years is considered deliverable and takes into account advice set out in paragraph 48 of the NPPF, paragraph ID 3-033 of

- the PPG and paragraph 3.19A of the London Plan. Should the Council have used the small site target of 352 units per annum the allowance would be in the region of 1100 units.
- 2.17 The 730 units include an annual allowance of 120 units per annum in addition to a small uplift of 130 units in total over the five year period. The small uplift relates to the role that future initiatives or permitted development rights (including changes of use from office to residential) could play over the five year period. These include the Home Builders Fund launched by the DCLG in October 2016 that plans to invest £3 billion for 25,000 new homes (up to 2020) within the five year period and for 200,000 new homes in the longer term. The funding will help support the custom and self-build sector, making loans available for small and medium enterprise builders (schemes of 5+ units) delivering new homes. It also includes funding for off-site construction and infrastructure. The Starter Home initiative also has potential to contribute to increased housing delivery and details relating to funding within London will be forthcoming.
- 2.18 Out of the 1351 small sites included in the five year housing land supply 620 units have planning permission or have commenced on site. With regard to the split between large and small sites within the five year housing supply, the small sites element is nearly 400 units less than that 'predicted' in the GLA's 2013 SHLAA. This highlights that an increased number of large deliverable sites are contributing to the supply than predicted in 2013.

Small sites	No. of units
Units with planning permission or commenced	196
Office to residential PD commenced (9+ units)	309
Site <9 units commenced	116
Future delivery of other small sites with planning permission	730
TOTAL	1351

Table 3: Small sites included within five year housing land supply Nov. 2016

b) Sites that have commenced

- 2.19 The sites that have started are considered deliverable over the five year supply period. Any completed sites were removed from the list in addition to units on uncompleted sites (up to October 2016).
- 2.20 There are approx. 116 units on small sites (<9 units) that have started and it is expected that these will be delivered by the end of the five year supply period (includes a small number of units for prior approval office to residential units).

c) Large Identified sites and Draft Allocations

Opportunity Site B Tweedy Road (Identified site within BTCAAP 2010)

- 2.21 Opportunity Site B Tweedy Road (0.37ha) is a development site (0.33ha) within the adopted Bromley Town Centre Area Action Plan (BTCAAP) (2010) for proposed residential development. The BTCAAP states that Policy BTC2 and the density matrix in the London Plan could facilitate around 70 units. It also states that the number of units is dependent on an acceptable design and massing of development and not having an unacceptable impact on the character and appearance of the locality.
- 2,22 The Council's Development Control (09/02/2016) and Executive Committee (10/02/2016) considered a report by the Council's Head of Renewal on design guidance and the disposal of the site. The report explained that the site was being used as the works compound for the Bromley North Village Public Realm Improvements and it was anticipated that these works would be completed by the end of February 2016, following which the temporary use would cease. The site is surplus to operational requirements and approval was sought for the marketing of the site for sale and possible joint venture options.
- 2.23 The report acknowledged that the site is sensitive and reference is made to an appeal for a 72 unit scheme in 2009 that was dismissed. Officers have worked with architects to draft clear development guidance as to the form and style of development that would be considered acceptable on the site and this has been endorsed by Members. In summary, the guidance suggests design guidelines of: 3 x 3 storey residential blocks with 8 units per block (24 units), 24 car parking spaces, pitched roof third floor and landscaped frontage. Given the site has been marketed and its previous use (as a compound) has ceased, the site could be deliverable within the five year period.
- 2.24 The following sites are included in the Council's Proposed Submission Draft Local Plan within Years 2 6 of the Plan period. The Plan period runs from 2015/16 2029/30. A summary of the site, policy description and expected deliverability timescales for each site are set out below.

Land adjacent to Bromley North Station BR1 (Draft Allocation Proposed Submission Draft Local Plan)

2.25 Site and policy description – 3ha site for redevelopment for mixed use including <u>525 residential units</u>, 2000 sqm of office accommodation, space for community use, 230 sqm café/retail, transport interchange and parking.

Proposals will be expected to:

Provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre;

Respect and enhance the setting of the Grade II Listed Bromley North station building;

Allow for the long term aspirations from improved rail connectivity to central and east London.

Phasing and Current Status – 80 units fall within the 5YHLS period, the site is included within the Bromley Town Centre Housing Zone bid.

Banbury House Bushell Way Chislehurst BR7 (Draft Allocation Proposed Submission Draft Local Plan)

2.26 Site and policy description – 0.27ha site for redevelopment for approximately <u>25 residential units</u>. Vacant care home and offices on site with associated car parking and amenity area.

Proposals will be expected to:

Respect the amenity of adjoining residential properties.

Phasing and Current Status – 25 units fall within the 5YHLS period. The site is Council owned and is currently vacant.

Small Halls York Rise Orpington (Draft Allocation Proposed Submission Draft Local Plan)

2.27 Site and policy description – 0.46ha site for redevelopment for approximately <u>35 residential units</u>.

Proposals will be expected to:

Respect the amenity of adjoining residential properties.

Phasing and Current Status – 35 units fall within the 5YHLS period. The site is Council owned and is currently vacant (community hall previously demolished). Temporary approval has been granted for use as a car park.

Homefield Rise (18-44) Orpington BR6 (Draft Allocation Proposed Submission Draft Local Plan)

2.28 Site and policy description – 0.75ha site for redevelopment for approximately <u>87 net residential units</u>.

Proposals will be required to:

Create an effective transition between the adjacent town centre and lower rise residential area;

Respect the amenity of adjoining residential properties.

Phasing and Current Status – 87 net units fall within the 5YHLS period. The site is currently occupied by 13 residential properties.

Other Draft Allocations within Proposed Submission Draft Local Plan (with planning permission)

<u>Bassetts Campus Broadwater Gardens BR6 7UZ (Draft Allocation Proposed Submission Draft Local Plan)</u>

2.29 Site and policy description – 2.6ha site for redevelopment for approximately <u>115 residential units</u> (including conversion of Bassetts House).

Proposals will be expected to:

Protect and enhance the locally listed Bassetts House;

Address the site-wide Tree Protection Order:

Protect and enhance the Bassetts Pond SINC:

Respect the surrounding suburban residential character.

Phasing and Current Status – 115 units fall within the 5YHLS period. Planning permission has been granted (15/04941/FULL3) subject to a legal agreement for the conversion of Bassetts Campus to 13 flats and the development of 102 residential units. The site is currently vacant having been previously used for C2 purposes.

Orchard Lodge William Booth Road Anerley SE20 (Draft Allocation Proposed Submission Draft Local Plan)

2.30 Site and policy description – 1.8ha site for redevelopment for approximately 250 residential units.

Proposals will be expected to:

Ensure the effective decontamination of existing land and buildings;

Protect the amenity of adjoining residential properties.

Phasing and Current Status – 250 units fall within the 5YHLS period. Planning permission has been granted (16/02117/FULL1) subject to a legal agreement for the erection of two 4-5 storey blocks and one 5-6 storey block of flats comprising 252 residential units. The site currently comprises vacant buildings and hardstanding.

Former Depot Bruce Grove Orpington

2.31 Site and policy description – 0.36ha site for redevelopment for 28 residential units.

Proposals will be expected to:

Respect and compliment The Priory Conservation Area and adjacent listed building;

Mitigate flood risk;

Minimise the adverse impacts on the amenities of the neighbouring residential street.

Phasing and Current Status – 28 units fall within the 5YHLS period. Planning permission has been granted (15/04574/FULL1) subject to a legal agreement for 28 residential units. The site is currently vacant having previously been used for a Dairy Depot.

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

2.32 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 from 2004 - 2014 approximately 90 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 – 2015, 696 units) but a conservative allocation of 100 units over the five year period would be reasonable.

f) Changes of use from office to residential

- 2.33 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. From April 2016 these permitted development rights have been made permanent and where prior approval has been granted (from 6th April 2016) it is specified that it should be completed within three years of the approval date.
- 2.34 Schemes that propose 9 units or more and have relevant building control applications in place are included in the supply. As set out in Appendix 1 all of the prior approval schemes listed have actually commenced on site. To date the Council have received approximately 95 prior approval applications to change the use from office to residential and approximately 700 units have been granted prior approval.
- 2.35 It is considered that during the five year housing supply period an estimated delivery of an additional 200 units would be reasonable. This figure has increased from the 150 included in the June 2015 Five Year Housing Supply Paper for the Borough. In light of the increased certainty, following the permitted development rights being made permanent in April, it is considered the increase is justified.
- 2.36 Contributions from this source are likely to include large and small sites.

3.0 CONCLUSION

- 3.1 The Council's five year housing supply position will be monitored and updated on a regular basis.
- 3.2 The sites listed in Appendix 1 are considered to be deliverable within the five year housing supply period. Factual appendices will be produced and attached to the 5YHLS Paper where relevant and appropriate to elaborate on the deliverability of sites.
- 3.4 Appendix 1 illustrates that Bromley is able to meet its five year supply target of 3332 units (including the 5% buffer) given that there are 3544 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 November 2016

Five year housing supply capacity		Five year housing supply targets
Known sites with planning permission not commenced	537	Target of 641 units per annum x 5 = 3205 units
Known sites commenced (up to end March 2015)	1217	Delivery for 15/16 = 673 units (+32 units)
Allocated sites and draft Local Plan allocations	644	Five year housing supply target = 3205 – 32 units
Small sites started (including prior approval)	116	(3173 units)
Small sites allowance	730	3173 units plus 5% buffer = 3332 units
B1(a) to C3 Prior Approval allowance	200	
Vacant units brought back into use	100	
TOTAL	3544	

Conclusion: Five year housing supply of 3544 exceeds target of 3173 and the additional 5% buffer moved forward from later in the plan period to total 3332 units (i.e. target plus 5%).

Table 4 Summary of five year housing land supply November 2016

APPENDIX 1: FIVE YEAR HOUSING LAND SUPPLY 01/04/16 to 31/03/21

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
Identified sites and draft Local Plan allocations							
Site B Tweedy Road/London Road	N/A	Bromley Town	N/A	BTCAAP	Large	0.37	24
Land adjacent to Bromley North Station	N/A	Bromley Town	N/A	Draft Alloc	Large	2.86	80
Banbury House Bushell Way Chislehurst BR7 6SF	N/A	Chislehurst	N/A	Draft Alloc	Large	0.27	25
Orchard Lodge William Booth Road Anerley London SE20	16/02117/FULL1	Crystal Palace	26.10.2016	Draft Alloc	Large		250
Small Halls York Rise Orpington	N/A	Farnborough and Crofton	N/A	Draft Alloc	Large	0.46	35
Bassetts Campus Broadwater Gardens BR6 7UZ	15/04941/FULL3	Farnborough and Crofton	18.08.2016	Draft Alloc	Large	2.5	115
Former Depot Bruce Grove Orpington	15/04574/FULL1	Orpington	09.11.2016	Draft Alloc	Large	0.3	28
Homefield Rise Orpington BR6	N/A	Orpington	N/A	Draft Alloc	Large		87
Total							644
Large sites with planning permission/commenced							
Church Road Biggin Hill (1-9) TN16 3LB	15/02007/FULL1	Biggin Hill	11.07.2016	Р	Large	0.3	27
Land between Main Road Vincent Square Barwell Crescent and Moxey Close Biggin Hill TN16 3GD	15/00508/FULL1	Biggin Hill	23.09.2016	Р	Large	0.7	16
Bromley Common Liveries Cameron Buildings Bromley BR2 8HA	14/03398/OUT	Bromley Common and Keston	27.07.2015	Р	Large	2.9	9

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
Site C Old Town Hall Tweedy Road BR1	16/01175/FULL1	Bromley Town	08.11.2016	Р	Large	0.7	53
Grays Farm Production Village (Care Home units) Grays Farm Road	14/00809/FULL1	Cray Valley West	05.09.2014	Р	Large	0.4	75
The Haven Springfield Road SE26 6HG	14/03991/FULL1	Crystal Palace	31.03.2015	Р	Large	1.4	46
All Saints Catholic School Layhams Road West Wickham BR4 9HN	13/03743/FULL3	Hayes and Coney Hall	13.05.2016	Р	Large	2.3	48
Langley Court South Eden Park Road BR3 3AT	12/00976/OUT	Kelsey and Eden Park	17.06.2014	Р	Large	10.6	179
20-22 Main Road Biggin Hill TN16 3EB	12/01843/FULL1	Biggin Hill	15.10.2012	S	Large	0.4	9
Blue Circle Sports Ground Crown Lane Bromley BR2 9PQ	10/00740/DET	Bromley Common and Keston	22.07.2011	S	Large	12	22
Land at South Side of Ringers Road BR1 1HP	07/03632/FULL1	Bromley Town	04.01.2008	S	Large	0.27	34
Site K Westmoreland Road Car Park of BTCAAP	11/03865/FULL1	Bromley Town	26.03.2012	S	Large	0.96	200
Dylon International Ltd Worsley Bridge Road SE26 5HD	13/03467/FULL1	Copers Cope	15.04.2010	S	Large	0.28	74
Dylon International Ltd Worsley Bridge Road SE26 5HD	09/01664/FULL1	Copers Cope	16.02.2015	S	Large	0.28	149
Grays Farm Production Village	14/00820/OUT	Cray Valley West	12.03.2015	S	Large	1.09	45
1 Chilham Way BR2 7PR	13/01670/FULL1	Hayes and Coney Hall	13.03.2014	S	Large	0.78	14
Isard House Glebe House Drive Hayes	14/01873/FULL1	Hayes and Coney Hall	10.12.2014	S	Large	0.57	21

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
Hayes Court West Common Road BR2 7AU	14/02364/FULL1	Hayes and Coney Hall	17.12.2014	S	Large	2.6	17
The Rising Sun Upper Elmers End Road BR3 3DY	13/03889/FULL1	Kelsey and Eden Park	09.04.2015	S	Large	0.18	16
Oakfield Centre Oakfield Road SE20 8QA	13/01872/FULL1	Penge and Cator	21.05.2014	S	Large	0.3	24
Sundridge Park Management Centre Ltd Plaistow Lane Bromley BR1 3JW	12/03606/FULL1	Plaistow and Sundridge	06.11.2013	S	Large	2.27	28
Holy Trinity Convent School Plaistow Lane BR1 3LL	12/02443/FULL1 and 12/02913/FULL2	Plaistow and Sundridge	07.11.2011	S	Large	0.95	22
25 Scotts Road BR1 3QD	13/00905/OUT	Plaistow and Sundridge	11.06.2014	S	Large	0.4	38
Summit House Glebe Way BR4 0RJ	14/03324/FULL1	West Wickham	02.04.2015	S	Large	0.5	54
Total							1220
Small sites with planning permission/commenced							
165 Masons Hill BR29HW	14/04199/FULL1	Bromley Town	18.09.2015	Р	Small	0.13	23
H G Wells Centre St Marks Road Bromley	13/03345/FULL1	Bromley Town	13.08.2015	Р	Small		52
155-159 High Street BR6 0LN	15/01690/FULL3	Orpington	03.09.2015	Р	Small	0.1	9
Homesdale Centre 216-218 Homesdale Road BR1 2QZ	Various	Bickley	Various	S	Small	0.012	6
57 Albemarle Road BR3 5HL	14/01637/FULL1	Copers Cope	28.08.2015	S	Small	0.16	14
193 Anerley Road Penge SE20 8EL	12/03859/FULL1	Crystal Palace	26.03.2013	S	Small	0.13	9
Orpington Police Station The Walnuts BR6 0TW	14/03316/FULL1	Orpington	17.04.2015	S	Small	0.2	83
Total							196

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
Small granted RESPAS commenced							
Title House 33-35 Elmfield Road BR1 1LT	14/04850/RESPA	Bromley Town	10.02.2015	S	Small	0.19	50
Broadway House High Street BR1 1LF	15/00696/FULL1 and 14/01711/RESPA	Bromley Town	30.10.2015 27.06.2014	S	Small	0.08	43
Crosby House Elmfield Road BR1 1LT	15/03097/FULL1 and 13/02968/RESPA	Bromley Town	06.10.2015 23.10.2013	S	Small	0.2	22
Oxford House 11 London Road BR1 1BY	14/04860/RESPA 15/01852/RESPA	Bromley Town	23.01.2015 03.07.2015	S	Small	0.06	17
Waterford House 4 Newman Road BR1 1RJ	14/01379/RESPA	Bromley Town	09.06.2014	S	Small	0.04	14
County House 221-241 Beckenham Road BR3 4UF	14/00449/RESPA	Clock House	08.09.2014	S	Small	0.12	75
Berwick House 8-10 Knoll Rise BR6 0EL	14/02086/RESPA	Orpington	14.11.2014	S	Small	0.1	88
Total							309
Large granted RESPAS commenced							
Mega House Crest View Drive BR5 1BY	14/02500/RESPA	Petts Wood and Knoll	15.08.2014	S	Large	0.3	29
Total							29
Sites of 9+ units total							2398
Small sites started							116
Small sites projection							730

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
Vacant units projection							100
Prior approval projection							200
TRAJECTORY TOTAL							3544

Subdivision of small and large sites set out above			
Small Sites	1351		
Large Sites	1893		
Prior Approval and Vacant Units	300		
TOTAL	3544		