

London Borough of Bromley

Five Year Housing Land Supply 2017

## **LB BROMLEY FIVE YEAR HOUSING LAND SUPPLY (5YHLS, 2017)**

### **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 (01/04/17-31/03/22).

### **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.<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 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 has sought to identify draft allocations for housing, taking into account the minimum target figure for the Borough of 641 units per annum. A number of sites were recommended for allocation (including residential and mixed uses) in the Submission Draft Local Plan November 2016 that are included in the 5YHLS. The Plan was submitted in August 2017 and is currently being examined.
- 2.7 Detailed consideration of housing supply numbers was undertaken following the 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). The decision concluded that the Council did not have a 5YHLS. This fed into the Council's Submission Draft Local Plan referred to above (November 2016) and the 5YHLS in November 2016. Changes were made to the small site allowance methodology to take into account the most recent small site completion data. The appropriateness of a lapse rate (to sites with planning permission not commenced) was also considered. With regard to lapse rates, paragraph 2.1.21 of the Council's Submission Draft Local Plan November 2016 sets out that in practice, large site windfalls in policy compliant locations do come forward, and reduce the risk of underachievement (or lapsing) in housing delivery. Furthermore, the NPPF requirement is for 'deliverability' which

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

includes a degree of uncertainty. The application of a lapse rate was not considered necessary in November 2016, to deliverable sites within the 5YHLS. This approach has been carried forward in the 2017 5YHLS.

- 2.8 Paragraph 3.2 of the November 2016 5YHLS made reference to additional appendices that may be produced to elaborate on the deliverability of sites. A background paper, Five Year Housing Land Supply Background Paper Lapse Rates (June 2017) was submitted with the Draft Local Plan that sets out evidence on lapse rates in the Borough to support the above position.

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

- 2.9 Table 1 below illustrates that housing completions have exceeded annual targets (2007 – 2016) and are in excess of the cumulative target by approximately 1270 units. In light of this, it is considered that a buffer of 5% is relevant in accordance with paragraph 47 of the NPPF.

	<b>Small sites</b>	<b>Large Sites</b>	<b>NSC units</b>	<b>Annual target</b>	<b>Cumulative target</b>	<b>Total</b>	<b>Cumulative total</b>
2007/08	370	343		485	485	713	713
2008/09	369	136		485	970	505	1218
2009/10	245	313		485	1455	558	1776
2010/11	309	446		485	1940	755	2531
2011/12	385	261		500	2440	646	3177
2012/13	235	292		500	2940	527	3704
2013/14	180	515		500	3440	695	4399
2014/15	167	259		500	3940	426	4825
2015/16	315	433	-11	641	4581	737	5562
2016/17	528	330	75	641	5222	933	6495

Table 1 Completions 2007/08-2016/17

- 2.10 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. From 15/16 – 16/17 the minimum target for the borough was 1282 units. During

this period of time 1670 units have been completed, 388 units above the monitoring target for the borough.

<b>Financial Year</b>	<b>Completions needed or delivered</b>	<b>Cumulative Target</b>
2015/16	737	641
2016/17	933	1282
2017/18 – 21/22	3205	4487
2022/23	641	5128
2023/24	641	5769
2024/25	641	6410

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

2.11 A 5% buffer would increase the five year figure from 3205 units to 3365 units.

## **Five Year Supply Position**

2.12 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 sites (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;
- f) Non-self-contained units.

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

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

2.14 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.

2.15 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 the most up to date small site completion data. The methodology is explained in paragraph 2.69 – 2.72 (pages 38-39) of the SHLAA.

2.16 Completions on small sites resulting from permitted development rights to change the use from office to residential have been included in the calculation. There have been approximately 400 completions from the latter source since 2014/15. The inclusion of these units is considered justified in light of the fact that PD rights are now permanent and future supply will be generated from the use of these PD rights in parts of the borough. See also paragraphs 2.33 to 2.36 below.

2.17 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 1139 units, 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.

- 2.18 The 1139 units include an annual allowance of 202 units per annum (1009 units over five years) 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. It is apparent that there has been an unprecedented level of interest in the fund since its launch in 2016 (£200 million of funding allocated by January 2017). The Starter Home initiative also has potential to contribute to increased housing delivery and details relating to funding within London will be forthcoming.
- 2.19 Out of the 1495 units from small sites included in the 5YHLS, 356 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 265 units less than that 'predicted' in the GLA's 2013 SHLAA. This highlights the number of large deliverable sites that are contributing to the supply than predicted in 2013, in addition to approximately 80 RESPA units that are identified on large and small sites. The summary table at the end of Appendix 1 sets out the split between large and small sites (1495 small sites compared with 1836 large sites excluding prior approval and vacant unit allowance, non-self-contained-units).

<b>Small sites</b>	<b>No. of units</b>
Units with planning permission or commenced	206
Site <9 units commenced	98
Office to residential PD commenced (9+ units)	52
Future delivery of other small sites with planning permission	1139
<b>TOTAL</b>	<b><u>1495</u></b>

Table 3: Small sites included within five year housing land supply 2017

### **b) Sites that have commenced**

- 2.20 The sites that have started are considered deliverable over the five year supply period. Sites included in Appendix 1 are considered to contribute to the supply of units over the whole five year period (2017/18 – 21/22). Therefore, it is possible that there are some units included in the list that have already completed (i.e. from 1<sup>st</sup> April 2017 up to date of 5YHLS Paper). These units should not be excluded as they are contributing to the rolling supply of completions from one five year period to another. The completion data included in Table 1 only deals with unit completions up to 31 March 2017.

2.21 There are approx. 98 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.

**c) Large Identified sites and Draft Allocations**

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

- 2.22 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.
- 2.23 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.
- 2.24 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.
- 2.25 The following sites are included in the Council's Submission Draft Local Plan in Appendix 10.1. The Plan period runs from 2015/16 – 2029/30 and the units identified below are considered to be deliverable in the 5YHLS period. A summary of the site, policy description and expected deliverability timescales for each site are set out below.

**Site 2 Land adjacent to Bromley North Station BR1 (Draft Local Plan Allocations)**

- 2.26 Site and policy description – 3ha site for redevelopment for mixed use including 525 residential units, 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 – 120 units fall within the 5YHLS period (relevant to Sherman Road/Tweedy Road element of the overall draft allocation). See also Site Assessments 2017.

Site 4 Gas holder, Homesdale Road/ Liddon Road, Bickley BR1 2SR (Draft Local Plan Allocations)

2.27 Site and policy description – 1ha site for redevelopment for mixed use including 60 residential units.

Proposals will be expected to:

Include employment floorspace.

Ensure complete remediation of contaminated land.

Mitigate flood risk.

Phasing and Current Status – 60 net units fall within the 5YHLS period. Currently comprises two disused gas holders with hardstanding areas. The gas holders received demolition consent in 2015 and are being dismantled. See also Site Assessments 2017 document.

Site 5 Land adjacent to Bickley Station (Draft Local Plan Allocations)

2.28 Site and policy description – 0.85ha site for redevelopment for around 30 residential units.

Proposals will be expected to:

Take account of neighbouring Tree Protection Order

Reflect residential character

Ensure re-provision of station car parking

Phasing and Current Status – 30 net units fall within the 5YHLS period. Currently comprises a prefabricated building for Network Rail Telecoms team, a scaffolding storage/distribution yard, a cab office and telecommunications mast). See also Site Assessments 2017 document.

Site 11 Homefield Rise (18-44) Orpington BR6 (Draft Local Plan Allocations)

2.29 Site and policy description – 0.75ha site for redevelopment of 18-44 Homefield Rise for around 87 net residential units.

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. See also Site Assessments 2017 document.

Site 12 Small Halls York Rise Orpington (Draft Local Plan Allocations)

2.30 Site and policy description – 0.46ha site for redevelopment for around 35 residential units.

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. See also Site Assessments 2017 document.

Site 13 Banbury House Bushell Way Chislehurst BR7 (Draft Local Plan Allocations)

2.31 Site and policy description – 0.27ha site for redevelopment for around 25 residential units. 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. See also Site Assessments 2017 document.

#### **d) 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 - 2016 approximately 75 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 – 2016, 591 units) but a conservative allocation of 100 units over the five year period would be reasonable.

#### **e) 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 6<sup>th</sup> 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.

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 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 The allowance of 200 units is considered deliverable in light of the fact that completions from this component since 2014 have reached over 400 units and there are approximately 395 units currently in the pipeline (excluding units identified in this 5YHLS paper).

#### **f) Non-self-contained units**

2.37 Non-self-contained units have been included as a component of supply since the start of the London Plan period (15/16). The units can include C2 (i.e. Care Homes) and Sui Generis Units (i.e. HMOs). The recording of bedroom losses is considered on a case by case basis depending on the length of time a facility has been vacant. For example, if a facility has been vacant for a relatively short period of time (0-1 years before the grant of planning permission) the number of bedrooms are likely to be netted off. For longer term vacancy examples (i.e. 2+ years) the losses may not be recorded depending on site circumstances. The GLA's Annual Monitoring Report for 15/16 (2.22 – 2.26) discusses some of the issues related to the recording of non-conventional supply. The method for monitoring this component is not prescriptive and is due to be reviewed through the London Plan.

### **3.0 RISK ASSESSMENT FOR HOUSING LAND AVAILABILITY**

#### **a) Monitoring Housing Completion Record**

- 3.1 The completion of dwellings in both 2015/2016 and 2016/2017 has clearly exceeded the London Plan target of 641 per year. As evident from the above table, 1670 dwellings were completed against a target of 1282. That is a total of 388 dwellings completed over the London Plan target equivalent to 0.6 years supply (based on 5 years at 641 per year). This shows that the overall record of delivery is good.

#### **b) Composition of Five Year Supply**

- 3.2 The SHLAA (2013) shows that the 641 housing target is comprised of 352 on small sites and 289 on large sites (45% of the overall target). The small sites are largely to be provided as an Allowance rather than identifying separate sites in advance. The 2017 5YHLS shows that onward 50% of the supply is on identified large sites so there is a reduced dependence on the small sites allowance.

#### **c) Range of Sites**

- 3.3 There is a wide range of sites by size, ownership and location around the Borough. A large proportion of sites of 0.25ha or more (large sites) with planning permission have already commenced development (1156 out of 1426 in addition to 29 units on a large RESPA scheme), so increasing the certainty of deliverability. Through the draft Local Plan, there is a forward supply of longer term sites (beyond the 5YHLS) which can be brought forward in the event that completions lag behind the expectations in the 5YHLS.

#### **d) NPPF Criteria**

- 3.4 The use of the NPPF 'deliverability' criteria is creating improved certainty in the 5YHLS as partly reflected in the rate of completions.

#### **4.0 CONCLUSION**

- 4.1 The Council's five year housing supply position will be monitored and updated on a regular basis.
- 4.2 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.
- 4.3 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 3657 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 2017**

<b>Five year housing supply capacity</b>		<b>Five year housing supply targets</b>
Allocated sites and draft Local Plan allocations	381	Target of 641 units per annum x 5 = 3205 units
Known sites with planning permission not commenced	295	Delivery for 15/16 – 16/17 = 1659 units (+388 units)
Known sites commenced	1337	
Prior approval schemes	81	Five year housing supply target = 3205
Non-self-contained-units	26	
Small sites started	98	
Small sites allowance	1139	3205 units plus 5% buffer = <b>3365 units</b>
Vacant units brought back into use	100	
B1(a) to C3 Prior Approval allowance	200	
<b>TOTAL</b>	<b>3657</b>	
Conclusion: Five year housing supply of 3657 exceeds target of 3205 and the additional 5% buffer moved forward from later in the plan period to total 3365 units (i.e. target plus 5%).		

Table 4 Summary of five year housing land supply November 2017

**APPENDIX 1: FIVE YEAR HOUSING LAND SUPPLY 01/04/17 to 31/03/22**

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
<b>Identified sites and draft Local Plan allocations</b>							
Land adjacent to Bickley Station	N/A	Bickley	N/A	Draft Alloc	Large	0.85	30
Gas Holder site, Homesdale Rd/ Liddon Rd	N/A	Bickley	N/A	Draft Alloc	Large	1	60
Site B Tweedy Road/London Road (BTCAAP)	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	120
Banbury House Bushell Way Chislehurst BR7 6SF	N/A	Chislehurst	N/A	Draft Alloc	Large	0.27	25
Small Halls York Rise Orpington	N/A	Farnborough and Crofton	N/A	Draft Alloc	Large	0.46	35
Homefield Rise Orpington BR6	N/A	Orpington	N/A	Draft Alloc	Large	0.75	87
<b>Total</b>							<b>381</b>
<b>Large sites with planning permission/commenced</b>							
Hassells Nursery Jackson Road BR2 8NS	16/05353/FULL1	Bromley Common and Keston	10/08/2017	P	Large	0.7	9
Site C Old Town Hall Tweedy Road BR1	16/01175/FULL1	Bromley Town	08.11.2016	P	Large	0.7	53
28 Park Hill Road BR2 0LF	16/00218/OUT	Copers Cope	05/04/2017	P	Large	0.26	9
56a Foxgrove Road Beckenham BR3 5D8	17/00624/OUT	Copers Cope	28/09/2017	P	Large	0.26	12

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
North Orpington Pumping Station East Drive Orpington	15/04610/FULL1	Cray Valley East	31/08/2017	P	Large	0.8	35
Crystal Palace Park Crystal Palace Park Road SE20	07/03897/OUT	Crystal Palace	N/A	P	Large	1.9	130
Sundridge Park Mansion Willoughby Lane Bromley BR1 3FZ	16/04478/FULL1	Plaistow and Sundridge	29/06/2017	P	Large	3.3	22
Site K Westmoreland Road Car Park of BTCAAP	11/03865/FULL1	Bromley Town	26.03.2012	S	Large	0.96	200
Bromley Common Liveries Cameron Buildings Bromley BR2 8HA	14/03398/OUT	Bromley Common and Keston	27.07.2015	S	Large	2.9	9
Church Road Biggin Hill (1-9) TN16 3LB	15/02007/FULL1	Biggin Hill	11.07.2016	S	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	S	Large	0.7	16
20-22 Main Road Biggin Hill TN16 3EB	12/01843/FULL1	Biggin Hill	15.10.2012	S	Large	0.4	9
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
The Haven Springfield Road SE26 6HG	14/03991/FULL1	Crystal Palace	31.03.2015	S	Large	1.4	46
Orchard Lodge William Booth Road Anerley London SE20	16/02117/FULL1	Crystal Palace	26.10.2016	S (Draft Allocation also)	Large	1.8	250

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
Bassetts Campus Broadwater Gardens BR6 7UZ	15/04941/FULL3	Farnborough and Crofton	18.08.2016	S (Draft Allocation also)	Large	2.5	109
All Saints Catholic School Layhams Road West Wickham BR4 9HN	13/03743/FULL3	Hayes and Coney Hall	13.05.2016	S	Large	2.3	48
Langley Court South Eden Park Road BR3 3AT	12/00976/OUT	Kelsey and Eden Park	17.06.2014	S	Large	10.6	179
Former Depot Bruce Grove Orpington	15/04574/FULL1	Orpington	09.11.2016	S (Draft Allocation also)	Large	0.3	28
25 Scotts Road BR1 3QD	13/00905/OUT	Plaistow and Sundridge	11.06.2014	S	Large	0.4	12
<b>Total</b>							<b>1426</b>
<b>Small sites with planning permission/commenced</b>							
North Clinic Station Road Bromley BR1 3LP	16/027770/OUT	Bromley Town	12/05/2017	P	Small	0.05	9
H G Wells Centre St Marks Road Bromley	13/03345/FULL1	Bromley Town	13.08.2015	S	Small	0.08	52
165 Masons Hill BR29HW	14/04199/FULL1	Bromley Town	18.09.2015	S	Small	0.13	23
57 Albemarle Road BR3 5HL	14/01637/FULL1	Copers Cope	28.08.2015	S	Small	0.16	14
Conifer House 44 Southend Road Beckenham BR3 1SL	16/02179/FULL1	Copers Cope	17/08/2016	P	Small	0.15	9
193 Anerley Road Penge SE20 8EL	12/03859/FULL1	Crystal Palace	26.03.2013	S	Small	0.13	9
Lubbock House, 1 Northolme Rise Orpington BR6 9RF	16/04956/FULL1	Farnborough and Crofton	02/03/2017	P	Small	0.13	-21
Palmer Bros Albert Road SE9 4SW	16/05879/FULL1	Mottingham and Chislehurst North	18/04/2017	P	Small	0.1	10

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
First Floor 50-52 The Walnuts Orpington BR6 0TW	16/03878/FULL1	Orpington	12/05/2017	P	Small	0.04	9
155-159 High Street BR6 0LN	15/01690/FULL3	Orpington	03.09.2015	P	Small	0.1	9
Orpington Police Station The Walnuts BR6 0TW	14/03316/FULL1	Orpington	17.04.2015	S	Small	0.2	83
<b>Total</b>							<b>206</b>
<b>Small granted RESPAS commenced</b>							
12 Elmfield Road Bromley BR1 1LR	16/01544/RESPA	Bromley Town	18/05/2016	S	Small	0.013	13
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	4
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	14
Berwick House 8-10 Knoll Rise BR6 0EL	14/02086/RESPA	Orpington	14.11.2014	S	Small	0.1	21
<b>Total</b>							<b>52</b>
<b>Large granted RESPAS commenced</b>							
Mega House Crest View Drive BR5 1BY	14/02500/RESPA	Petts Wood and Knoll	15.08.2014	S	Large	0.3	29
<b>Total</b>							<b>29</b>
<b>Non-self-contained unit schemes</b>							
Queen Mary House Manor Park Road	15/05237/FULL1	Chislehurst	23/02/2017	S			14

Sites of 9 units+	Borough reference number	Ward	Date of planning permission	Status	Site size	Site Area (ha)	Net gain
BR7 5PY							
The Alexandra Ph, 163 Parish Lane SE20 7JH	14/04392/FULL1	Penge and Cator	30/04/2015	P			12
							<b>26</b>
<b>Sites of 9+ units total</b>							
<b>Small sites started</b>							98
<b>Small sites projection</b>							1139
<b>Vacant units projection</b>							100
<b>Prior approval projection</b>							200
<b>TRAJECTORY TOTAL</b>							<b>3657</b>

<b>Subdivision of small and large sites set out above</b>	
Small Sites	1495
Large Sites	1836
Prior Approval and Vacant Units	300
Non-self-contained units	26
<b>TOTAL</b>	<b>3657</b>

