

1. Housing

What is our current approach?

- 1.1 The Bromley Local Plan sets out policies covering all aspects of housing, including identifying housing targets and suitable locations for housing; setting out affordable housing requirements; and providing guidance on housing design, residential extensions and conversions.
- 1.2 Policy 1 sets a broad range of locations where new housing will be developed to meet the Borough housing target, including allocated sites and town centres. Delivery of housing on small sites – less than 0.25 hectares – is also identified as an important element of housing supply. The Bromley Town Centre Opportunity Area is identified in the Local Plan and London Plan as an area for housing growth, with an indicative target of 2,500 homes to be delivered.
- 1.3 Policy 2 sets out the threshold for affordable housing provision, and policy on the required affordable housing tenure and housing size mix, informed by a Strategic Housing Market Assessment (SHMA). The policy mirrors the approach set out in the London Plan, whereby provision above 35% that also addresses other policy requirements is not required to provide viability evidence to justify the proposed provision. Exceptional circumstances where the Council would accept off-site affordable housing or payments in lieu are also set out.
- 1.4 The Local Plan includes a policy which supports the provision of specialist and older peoples accommodation. It also allocates a number of sites to help meet an identified need for Gypsy and Travellers and Travelling Showpeople, and sets out criteria that any new sites should accord with.
- 1.5 A number of Local Plan policies relate to householder applications, including policies on residential extensions and conversions.

What has changed?

- 1.6 The Bromley Corporate Strategy commits to delivering the housing targets set out in the Local Plan. The adoption of the new London Plan has increased Bromley's housing target from 641 units per annum (as set out in the adopted Local Plan) to 774 units per annum. This creates additional challenges in terms of finding new sites for housing development and optimising the capacity of housing sites in a way that also preserves Bromley's character.
- 1.7 Bromley cannot currently demonstrate a five-year housing land supply, meaning that there are not currently enough sites to meet our future housing targets. There are likely to be a number of reasons for this, for example several sites projected to come forward by the adopted Local Plan have not materialised; and macro-economic factors and associated impacts on the housebuilding sector are likely to have affected applications coming forward.
- 1.8 The new London Plan sets out the following policies to increase housing supply:
 - Policy H1 requires boroughs to prepare delivery-focused Development Plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, and optimise the potential for housing delivery

on all suitable and available brownfield sites through their Development Plans and planning decisions, including sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary. It is noted that this can take a number of forms, such as new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision.

- Policy H2 states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making; the policy sets out an indicative small site housing target, although this is a component of the overall housing target, not a specific target to be met in its own right in addition to the overall housing target. The policy also requires boroughs to recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites; identify and allocate appropriate small sites for residential development; and where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites.

- 1.9 The NPPF, at paragraph 69, also recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and states that local planning authorities should identify, through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless there are strong reasons why this cannot be achieved. The NPPF also advocates the use of tools such as area-wide design assessments to help bring small and medium sized sites forward;
- 1.10 The new London Plan has retained the Bromley Town Centre opportunity area designation, which identifies an indicative capacity of 2,500 new homes and 2,500 new jobs in the town centre. Policy SD1 sets out policy concerning opportunity areas, stating that boroughs should clearly set out how they will encourage and deliver the growth potential of Opportunity Areas in their development plans; and should support development which creates employment opportunities and housing choice for Londoners. London Plan Policy H1 notes that boroughs should enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA, to help achieve housing targets.
- 1.11 London Plan Policy H1 states that boroughs should establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value. The NPPF sets out definitions for 'deliverable' sites, i.e. sites which are expected to come forward within five years; and 'developable' sites or locations, i.e. sites or locations which are considered likely to come forward in the longer-term.
- 1.12 The NPPF and London Plan affordable housing threshold has also changed, to align with the definition of major development as set out in legislation, i.e. development proposals providing 10 residential units or more. The Local Plan threshold does not reflect this, instead seeking affordable housing on all housing developments capable of providing 11 residential units or more or where the residential floorspace is more than 1000sqm, irrespective of the number of dwellings.
- 1.13 The NPPF also states that provision of affordable housing should not be sought for residential developments that are not major developments; and expects that at least 10% of the total number of homes delivered as part of development be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

- 1.14 The Bromley Corporate Strategy sets out the aim to ensure the delivery of 1,000 new affordable quality homes; and that the housing needs and aspirations of more vulnerable people, including adults who have learning disabilities and older people, feature consistently in the development and delivery of our housing plans. Bromley's affordable housing completions in recent years have been poor, with less than 200 units completed since 2017/18.
- 1.15 The new London Plan incorporates the threshold approach to affordable housing, first introduced in the Affordable Housing and Viability Supplementary Planning Guidance (SPG) and reflected in the adopted Bromley Local Plan.
- 1.16 The NPPF definition of affordable housing was updated in 2018, with further amendments to PPG published in 2021 relating to the Government's new 'First Homes' tenure, a specific kind of discounted market sale housing.
- 1.17 London Plan policy H6 sets out new policy on affordable housing tenures that should be sought as part of new development, informed by evidence from the London-wide SHMA. The policy requires:
- a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
 - a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership; and
 - the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products based on identified need.
- 1.18 Policy D3 of the new London Plan replaced the density matrix approach, which set out a range of suitable housing densities, with a design-led approach, which requires all development to make the best use of land to ensure that site capacities are optimised. This means ensuring that development is of the most appropriate form and land use for the site, and that different design options are considered to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.
- 1.19 The new London Plan has policies covering various forms of housing, including build to rent (policy H11), supported and specialised accommodation (policy H12), specialist older persons housing (policy H13), gypsy and traveller accommodation (policy H14), purpose-built student accommodation (policy H15) and large-scale purpose-built shared living (policy H16). The NPPF requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community, including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. Where need for such housing is established, it is expected that local planning policies would aim to address this need.

How can the new Local Plan respond to these changes?

- 1.20 Identifying sufficient housing supply to meet housing targets will be a key challenge for the new Local Plan. A significant element of housing supply is likely to be delivered from large sites (0.25 hectares or more), and the Local Plan can play a significant role in bringing such sites forward by allocating them for development. Any allocated sites would be identified in accordance with the Local Plan spatial strategy, which will identify locations for strategic development and in broad terms the location for growth, areas with significant opportunities

for change and enhancement, as well as areas where protection and more constrained development is anticipated. Detailed evidence will be compiled to inform the spatial strategy, including a characterisation study.

- 1.21 The NPPF, at paragraph 119, is clear that objectively assessed needs (such as housing need) is accommodated in a way that makes as much use as possible of previously-developed or 'brownfield' land; and at paragraph 105, the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The London Plan policy H1 echoes the NPPF, requiring boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites.
- 1.22 The site allocations in the adopted Local Plan have basic parameters in terms of site specific requirements. Considering the London Plan shift to a design-led approach, any site allocations in the new Local Plan could set out more detailed parameters, including detailed design requirements relating to height, scale, massing and other components of design. This would serve to give a realistic indication of housing capacity on sites, which would help to demonstrate deliverability of sites, give more certainty to site owners about what is considered suitable and ultimately assist with the adoption of a delivery-focused Local Plan as per London Plan requirements.
- 1.23 Small sites currently play an important role in housing delivery in Bromley, and will continue to do so. Some intensification of small sites delivery, increasing the current rate of delivery, could be investigated, in line with London Plan policy H2 requirements; however, any intensification would need to be particularly mindful of the borough's predominantly suburban, low-rise character. Tools such as design codes could be put in place to set clear parameters for such intensification. This could cover different geographies, for example covering a specific site or a broad area.
- 1.24 Maximising affordable housing delivery is also a key issue for the Local Plan, reflecting policy requirements in the London Plan and NPPF, and Council priorities. A new SHMA will be prepared to provide updated evidence on affordable housing need, which will inform any new policy on affordable housing in terms of the tenure and amount of affordable housing sought, along with requirements set out in the NPPF and London Plan. While noting the NPPF policy limiting the ability of local planning authorities to seek affordable housing on non-major development, such provision could help improve affordable housing delivery to help address identified need, either through direct provision of homes or through financial contributions. A small sites affordable housing requirement could therefore be explored as part of the new Local Plan.
- 1.25 Viability considerations also need to be taken into account when preparing the Local Plan policies; any level of affordable housing sought in the new Local Plan will need to be viable. This will be considered as part of an overarching Local Plan viability study.
- 1.26 The new SHMA will also inform new policy on the required housing size mix, in terms of what size units are needed as part of new housing development; and set out evidence of need for different types of housing, such as older persons accommodation. Updated evidence on gypsy and traveller need will also be sought. Evidence of need for these different types of housing will be used to inform the development of Local Plan policies for each different type of housing.
- 1.27 The adopted Local Plan has a policy on houses in multiple occupation (HMOs), which sets out criteria to assess potential adverse impacts that may arise from such development. The Council has put in place Article 4 Directions to remove C3 to C4 permitted development rights, covering the entire borough this means that all HMOs will now need planning permission. The

Local Plan review gives an opportunity to revisit this policy to ensure that the full range of potential impacts associated with HMOs can be adequately assessed.

- 1.28 New housing typologies and development models have emerged in recent years and are reflected in the London Plan and NPPF, such as large-scale purpose-built shared living (also known as co-living accommodation) and purpose-built private rented sector accommodation (also known as 'build to rent'). The Local Plan could set out local-specific policy for such housing, potentially including specific locations that may be suitable. Any policy could also reflect the impact that certain typologies may have on delivering Council priorities, for example co-living proposals do not usually propose on-site affordable housing, meaning that such developments will have a lesser contribution towards meeting Bromley's affordable housing need.

Let us know your thoughts on Housing policy

Q1: Where should new housebuilding be focused in the borough, in order to meet housing need?

Q2: Should the Council seek to increase delivery from smaller sites (less than 0.25 hectares)?

Q3: Do you think the Council should seek to put in place detailed guidance and utilise tools such as design codes to guide housing development in the Borough?

Q4: How important is the delivery of affordable housing, and what (if any) specific affordable housing tenures should be prioritised, e.g. social rent, low cost home ownership?

Q5: Do you think the Council should investigate the potential for seeking affordable housing on small sites (less than 10 units)?

Q6: What size of new homes do you think should be prioritised?

Q7: What (if any) types of housing, other than conventional self-contained dwellings, do you think the Council should prioritise as part of the new Local Plan?

Q8: Is there anything else that you feel we need to address through the new Local Plan housing policies?