

2 Living in Bromley

Policy 1

Housing Supply

The Council will make provision for a minimum average of **641** additional homes per annum over the ten year plan period and where possible over the fifteen year plan period which will be achieved by:

- a - The development of allocated sites and sites with planning permission;
- b - Town centre renewal involving the provision of housing;
- c - The development of housing within Renewal Areas;
- d - The development or redevelopment of windfall sites;
- e - The conversion of suitable properties;
- f - Mixed use developments including housing in suitable locations;
- g - The provision of suitable non self-contained units;
- h - Vacant properties being brought back into use;
- i - Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities; and
- j - The development of housing in Broad Locations (additional large sites within Bromley Town Centre, Orpington Town Centre and other areas where there is existing large scale retail and sites due to public sector restructuring and other land disposal).

The following sites are allocated to include residential development as outlined in **Appendix 10.2** of the Plan:

- Bromley Civic Centre
- Land adjacent to Bromley North Station
- The Hill Car Park and adjacent lands
- Gas holder site, Homesdale Road
- Land adjacent to Bickley Station
- Bromley Valley Gym and adjacent land, Chipperfield Road and adjoining land
- Orchard Lodge, William Booth Road

- Bassetts Campus, Broadwater Gardens
- Former Depot, Bruce Grove, Orpington
- West of Bromley High Street and land at Bromley South
- 18-44 Homefield Rise, Orpington
- Small Halls, York Rise, Crofton Road
- Banbury House, Bushell Way, Chislehurst

Allocated sites will be subject to all relevant policies within the Local Plan and in addition subject to site specific requirements where necessary.

Supporting Text and Housing Implementation Strategy

2.1.1 Section 6 of the National Planning Policy Framework sets out national policy on the delivery of homes. Paragraph 47 sets out what local planning authorities should do to boost significantly the supply of housing. This includes housing needs assessments and identifying a supply of housing sites.

2.1.2 To assist in maintaining a five year supply of land for housing the Framework requires local planning authorities to look further into the future and to identify a supply of specific developable sites or broad locations for growth, for years 6-10 and where possible for years 11-15. London Plan Policy 3.3 provides a regional context for increasing housing supply and sets out London-wide and borough minimum targets for housing provision from 2015/16 – 2024/25. These are informed by the findings of the GLA's 2013 London Strategic Housing Land Availability Assessment (SHLAA) and the 2013 Strategic Housing Market Assessment (SHMA) and other analysis. Paragraph 3.14A of the London Plan states that, consistent with the NPPF the approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development.

2.1.3 Paragraph 3.17 of the London Plan states 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. The SHLAA methodology is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. The methodology has been developed and refined over time through partnership working with boroughs and others involved in London housing as well as to reflect the principles of government guidance on preparation of SHLAAs nationally.

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2.1.4 The Borough has a housing provision figure of 641 units per annum (6413 for the 10 years 2015/16 - 2014/25) as set out in Table 3.1 of the London Plan to assist in meeting requirements across London. The 2013 SHLAA specifies provision of approximately 289 units per annum on large sites (>0.25 ha) and 352 units on small sites (<0.25 ha). The figure for housing provision will be rolled forward over a 15 year period in line with advice set out in the London Plan and the GLA's Housing Supplementary Planning Guidance. Policy 3.3 of the London Plan specifies that boroughs should enable development capacity to be brought forward to meet targets whilst having regard to other policies in the Plan (i.e. development on brownfield land, intensification, town centre renewal, opportunity areas, mixed use, renewal of existing residential areas).

2.1.5 The trajectory in **Appendix 10.1** of the Local Plan sets out the anticipated sources of housing supply over the Plan period. (This trajectory is also available as a separate *Supporting Document* online or on request). Specific sites that will help contribute to housing supply within the Borough over the next 15 years include those in the Bromley Town Centre Area Action Plan (2010) and the Bromley Town Centre Opportunity Area, the five year supply of deliverable land for housing which is regularly updated and site allocations. Other housing units will also be provided on large and small windfall sites. The housing trajectory in Appendix 10.1 shows a total of 10,645 deliverable and developable dwellings over the Plan period, an annual average of over 700 dwellings.

2.1.6 The trajectory in Appendix 10.1 (and Table 1) shows that the Council has identified a 10,645 housing supply over the 15 year plan period, compared with a minimum housing supply based on 641 dwellings per annum, of 9,615. This trajectory is therefore consistent with the London Plan Policy 3.3, including its clauses Da and E. It does so first by seeking to supplement the London Plan minimum housing target of 641 per annum with extra housing capacity to close the gap between identified housing need and supply, a total of 1,030 dwellings over the plan period. It also does so by drawing upon the brownfield housing capacity of the sources set out in Policy 3.3 (E), such as an Opportunity Area and town centres.

2.1.7 Paragraph 48 of the NPPF 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. The Planning Practice Guidance (PPG) specifies in paragraph 3-24 that local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the NPPF).

2.1.8 The London-wide SHLAA 2013 made an assessment of the contribution that small sites (<0.25ha) have made to housing delivery within each London borough between 2004/05 and 2011/12. The figure was derived by taking an average of small site completions (new build, conversions and changes of use) 2004/05 – 2011/12 and removing 90% of new build completions built on garden land. The annual average figure for the Borough during this time period was 352 units. Over the ten year London Plan period (2015/16 – 24/25) the small site windfall figure could contribute 3520 units.

2.1.9 The London Plan (para 3.19A) observes that in compiling five 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 five year supply.

2.1.10 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.

2.1.11 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 Examination in Public and were accepted in the Planning Inspector's Report on the 2015 London Plan. However, 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.

2.1.12 Delivery of housing on small sites is significant in the Borough as demonstrated in the 2013 SHLAA. The inclusion of an allowance for small site completions over the Plan period takes into account advice set out in the NPPF, the PPG and the London Plan.

2.1.13 The housing trajectory illustrates the expected rate of housing delivery for a 15 year period. This will be monitored in a manner that is consistent with London Plan Policy 3.3 and supplemented by Bromley's Authority Monitoring Report, so as to maintain a five year supply of housing land to meet the housing targets. This may include providing sites brought forward from later in the plan period. The review of the Bromley Town Centre Area Action Plan (2010) is due to commence after Local Plan adoption, and the London Plan targets are due to be revised as part of a new London Plan by 2019.

2.1.14 The Council's Housing Implementation Strategy will ensure that the delivery of housing is regularly monitored. It will include the identification of new sites, liaison with developers with regard to their intentions, progress on sites, identifying risks of delay and non-delivery and sites which can be brought forward. It will also include and respond to the review of the London Plan and Bromley Town Centre Area Action Plan.

Table 1 - Summary of housing supply October 2016

	Size of site	1-5*	6-10	11-15	Totals

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		2015/16 t o 2019/20	2020/21 t o 2024/25	2025/26 t o 2029/30	
Allocations and BTCAAP sites	Large	396	1448	1005	2849
Large sites with planning permission / commenced	Large	1156	244	0	1400
Small sites with planning permission/completed	Small	144	52	0	196
Large prior approval granted	Large	29	0	0	29
Small prior approval granted	Small	309	0	0	309
Small sites allowance (small sites commenced to be factored in prior to draft local plan consultation)	Small	626	1320	1706	3652
Vacant units allowance		80	100	100	280
Prior approval allowance	Large/Small	200	0	0	200
Broad locations	Large	0	390	575	965
2015/16 completions to date		670	0		670
Small sites started (1 - 8 units)		76	19		95
Overall total		3686	3573	3386	10,645
Cumulative completions		3686	7259	10,645	
Cumulative strategic allocation		3205	6410	9615	

2.1.15 (*completions for 15/16 have been included in the above table subject to verification with the GLA)

2.1.16 A SHMA for the South-East London sub region was finalised in June 2014 and estimates an annual housing requirement across the sub region of 7188 units and a net annual need for 5000 affordable units. The net additional dwelling requirement for Bromley per annum was estimated at approximately 1320 units. Across the sub-region annual capacity targets identified within the 2013 SHLAA reach 7893 units. GLA household projections in 2014 estimate an annual short term variant of 1840 households per annum for the Borough and a long term variant of 1530 households per annum.

2.1.17 The 2014 SHMA highlights that the highest level of need across tenures within the Borough up to 2031 is for one bedroom units (53%) followed by 2 bedroom (21%) and 3 bedroom (20%) units. Larger development proposals (i.e. of 5+ units) should provide for a mix of units sizes and considered on a case by case basis.

2.1.18 Paragraph 3.19 of the London Plan states that boroughs should use their housing supply targets as a minima augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply. Examples of relevant locations that can help to achieve this include; town centres, opportunity and intensification areas and other large sites.

2.1.19 The allocations (including sites within Bromley Town Centre Area Action Plan) and broad locations referred to above are examples of such sites that will assist the Borough in meeting and exceeding its housing supply target over the Plan period. The key sites and broad locations identified above have the potential to deliver over 3800 units over the Plan period. The sites include; those identified following a call for sites in 2014, other known sites (for example Bromley Civic Centre and land adjacent to Bromley North Station) where an increase in density could be appropriate and sites identified in connection with the Bromley Town Centre Housing Zone (March 2016).

2.1.20 The broad locations include Bromley and Orpington Town Centres, mixed use development of single storey large format retail and other town centre sites, the reorganisation and disposal of land by the Council, and other public sector and partner agencies.

2.1.21 The housing supply policy aims to minimise the net loss of housing through changes of use or redevelopment. Proposals for changes of use or redevelopment will only be permitted in the circumstances outlined in the policy.

2.1.22 **Risk Assessment for Housing Land Delivery**

- The GLA and LBB will both monitor Bromley housing completions. The GLA takes the wider monitoring role across London as a whole. Completions against target may vary across London and local under or over achievements (if any) may be balanced by other achievements elsewhere in London.
- LBB will seek to bring forward other policy compliant large sites if the small sites rate is too low, for example in the Opportunity Area and other Town Centres and suitable Broad Locations in cooperation with landowners and developers. In practice, large site windfalls in policy compliant locations do come forward and reduce the risk of overall under-achievement.
- The post NPPF Five Year Housing Supply statements apply the NPPF criteria to 'deliverability' and this more recent housing land supply data should by definition minimise the risk of non-achievement.
- The early review of the London Plan, with its linked evidence base, should provide an early update of the housing land delivery in the Borough.

2.1.23 In any event, the PPG (3-027) advises that for years 11-15, Local Plans can pass the test of soundness even where the local planning authority have not been able to identify sites or broad locations for growth in years 11-15.

