



PROOF OF EVIDENCE FOR LONDON BOROUGH OF BROMLEY

PROOF OF EVIDENCE OF BEN JOHNSON

Appeal by Mr and Mrs Selby

Home Farm, Kemnal Road, Chislehurst BR7 6LY

PINS Ref: APP/G5180/W/24/3339919

LBB Ref: 22/03243/FULL1

I am Ben Johnson. My current position is Head of Planning Policy and Strategy at the London Borough of Bromley. I have worked as a town planner for 15 years, entirely in planning policy/spatial planning, both at a regional and local authority level, in London and North East England.

I hold a Bachelor of Arts Honours Degree in Town Planning and a Postgraduate Diploma in Town Planning from Newcastle University. I am a Full Chartered Member of the Royal Town Planning Institute.

I have had significant involvement with self-build and custom housebuilding since 2016, when the Self-Build and Custom Housebuilding Act 2015 came into force. I have personally led on the establishment and management of a self-build and custom housebuilding register, and I currently oversee the management of the Bromley register. In addition, I have led on the introduction of local eligibility conditions in two London Boroughs. This experience gives me a unique perspective on the issue of self-build and custom housebuilding in a local authority context.

The evidence which I have prepared and provide for this appeal (in this proof of evidence) is true to the best of my knowledge and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed in this proof of evidence are my true and professional opinions.

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1. Introduction

- 1.1. My proof of evidence provides an assessment of the proposed self-build housing, Vine House, setting out the rationale for the weight that the Council considers should be attributed to this provision. My proof does not discuss overall planning balance. This is set out in the evidence of David Bord.

2. Self-build and custom housebuilding in Bromley

Planning policy framework

- 2.1. The adopted Development Plan is made up of the Bromley Local Plan (2019) [CD9.9] and the London Plan (2021) [CD9.10]. I note upfront that these documents were prepared and examined against the NPPF 2012, and both documents were adopted prior to the publication of the latest version of the National Planning Policy Framework (NPPF) in December 2023. However, I consider that both the Bromley Local Plan and the London Plan are consistent with the latest version of the NPPF.
- 2.2. There is no specific Local Plan policy concerning self-build and custom housebuilding (hereafter “self-build”), although Local Plan policy 1 (Housing Supply) identifies sources of housing supply which could include self-build proposals, for example as part of the development or redevelopment of windfall sites as set out in Policy 1 Part D.
- 2.3. London Plan policy H2 states:
- “A. 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 in order to:*
- ...*
- 4) support those wishing to bring forward custom, self-build and community-led housing...”*
- 2.4. London Plan good growth objective GG4 states:
- “To create a housing market that works better for all Londoners, those involved in planning and development must:*
- A ensure that more homes are delivered*
- ...*
- C create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing...”*
- 2.5. The supporting text of good growth objective GG4 states:
- “1.4.6. The homebuilding industry itself also needs greater diversity to reduce our reliance on a small number of large private developers. New and innovative approaches to development, including Build to Rent, community-led housing,*

and self- and custom-build, will all need to play a role, and more of our new homes will need to be built using precision-manufacturing.”

- 2.6. The NPPF, at paragraph 63, states that plan-making authorities should establish the housing needs of people wishing to commission or build their own homes, and refers to the requirements of the Self Build and Custom Housebuilding Act 2015 (which I discuss below). The NPPF, at paragraph 70(b), also encourages local planning authorities to seek opportunities to support small sites to come forward for self-build.
- 2.7. Planning Practice Guidance (PPG)¹ provides broad guidance on self-build, with reference to the various legislative requirements and the NPPF. The PPG on this subject was last updated on 8 February 2021.
- 2.8. The planning application in this case (22/03243/FULL1) was validated on 29 September 2022. In May 2023, eight months into the application determination period, the Appellant submitted a Self-Build and Custom Housebuilding Technical Note (prepared by Iceni Projects) [provided at Appendix 12 of CD4.2]. This document was the first mention of the issue of self-build as part of this application. No mention of self-build was made in the Planning Statement submitted with the application [CD1.3], prepared by Robinson Escott; this includes a complete lack of any reference to self-build as part of the purported very special circumstances (VSCs) provided by the proposal.
- 2.9. I will address the points raised in the Technical Note in this proof, but I first acknowledge that I consider that the provision of a self-build dwelling is capable of being a VSC, although the weight to be given to this is in dispute in this case.

NPPF paragraph 11d

- 2.10. The Technical Note, at pages 12-13, argues that the absence of a specific self and custom housebuilding policy is reason to trigger paragraph 11(d) of the NPPF. I disagree that the Development Plan is silent on this matter. London Plan objective GG4 offers clear support for self-build housing to help diversify the housing market. London Plan policy H2 explicitly notes broad support for self-build housing.
- 2.11. Nothing in paragraph 11 of the NPPF prescribes a minimum level of detail that a policy must include; a policy could be a broad strategic policy or a more detailed development management policy. I note that Policy H2 applies to small sites of 0.25ha, and while the Home Farm application covers a much greater area, the vast majority of the application site concerns the proposed vineyard. The residential element is a very small proportion of the overall site area and therefore it is considered that policy H2 would be applicable.

¹ <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>

- 2.12. The Technical Note references three appeal decisions² which purportedly support the view that paragraph 11 is triggered where a Development Plan has no policies relating to self-build and custom housebuilding. However, the circumstances in these three appeals cited were entirely different, as based on the limited information included in the appeal decisions, the authorities in question (Canterbury x 2, and Wychavon) did have a policy vacuum relating to self-build housing. As noted above, this is not the case in Bromley (and London as a whole); paragraph 11 would not apply as there is a relevant Development Plan policy relating to self-build and custom housebuilding.
- 2.13. Notwithstanding this, even if the Inspector agrees with the Appellant and considers that there is a self-build policy vacuum in Bromley, paragraph 11 would not be engaged by virtue of footnote 7 of the NPPF, as the appeal site is located in the Green Belt. I note that none of the three appeals cited by the Appellant to support their paragraph 11 argument were in the Green Belt or triggered any other footnote 7 policies.

Legislative framework

- 2.14. The Self-build and Custom Housebuilding Act 2015 (as amended) (hereafter “the Act”) places a duty on certain public authorities (including London borough councils) to keep a register of individuals and associations of individuals who wish to acquire serviced plots of land³ to bring forward self-build and custom housebuilding projects; and a duty on these authorities to have regard to those registers in carrying out planning and other functions. Demand for self-build and custom housebuilding arising in an authority’s area in a base period⁴ is evidenced by the number of entries added during that period to the register. Bromley’s register was established in April 2016. It is important to note that the duty does not require authorities to provide serviced plots of land for each individual or association on the register; it is the total demand on relevant parts of the register that informs the level of serviced plots that need to be provided.
- 2.15. Section 2A of the Act sets out a duty to grant planning permission etc. Relevant authorities must give suitable development permission⁵ to enough suitable serviced plots of land to meet the level of demand from the register. Section 2A of the Act was amended by the Levelling-up and Regeneration Act 2023 which came into force on 31 January 2024. Section 2A(2) of the Act is now as follows (~~struck-through text~~ deleted; **bold text** added):

² Appeal references: APP/H1840/W/19/3241879; APP/J2210/W/18/3204617; and APP/J2210/W/20/3259181

³ Defined in the Act as: a plot of land that (a) has access to a public highway and has connections for electricity, water and waste water, or (b) can be provided with those things in specified circumstances or within a specified period. The Self-build and Custom Housebuilding Regulations 2016 clarifies that: a plot of land is a serviced plot of land if it can, in the opinion of a relevant authority, be provided with the things mentioned in paragraph (a) of the definition of that expression, within the period before any development permission granted in relation to that land expires.

⁴ The first base period is the period beginning with the day on which the register is established, and ending on 30 October 2016. Each subsequent base period is the period of 12 months beginning immediately after the end of the previous base period.

⁵ Defined in the Act as planning permission or permission in principle

*An authority to which this section applies must give ~~suitable~~ development permission **for the carrying out of self-build and custom housebuilding on** ~~in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in~~ **respect of** each base period.*

- 2.16. The Act at its section 2A(5A) refers to regulations that may make provision specifying descriptions of planning permissions or permissions in principle that are, or are not, to be treated as development permission for the carrying out of self-build and custom housebuilding for the purposes of this section. At the time of writing, no regulations or draft regulations have been published specifying such descriptions, nor has there been any further update (even interim) to the NPPF or PPG, or any Written Ministerial Statement.
- 2.17. Without further regulations, defining what development permissions can be counted is still a matter of interpretation. It is also important to note that any regulations may include transitional provisions, for example, any more restrictive definition of what permissions can be counted may only apply from future base periods, and not retroactively to past base periods. Transitional provisions such as this are common in new legislation, for example, the recent introduction of statutory Biodiversity Net Gain included transitional provisions whereby the new requirements did not apply to any application submitted before a certain date.
- 2.18. The Self-build and Custom Housebuilding (Register) Regulations 2016 set out detailed requirements relating to the determination of applications for individuals or associations of individuals' entry onto a self-build and custom housebuilding register, including age and residency restrictions.
- 2.19. The Self-build and Custom Housebuilding Regulations 2016 (hereafter "the Regulations") add further requirements relating to the register, including the option for a relevant authority (the Council in this case) to introduce local eligibility conditions, namely:
 - A local connection test, a criterion whereby only individuals who meet such conditions as the authority reasonably considers demonstrate that the individual has sufficient connection with the authority's area, are eligible; and
 - A financial solvency test, a criterion whereby only individuals who can demonstrate that they will have sufficient resources to purchase land for their own self-build and custom housebuilding, are eligible.
- 2.20. Where a relevant authority sets local eligibility conditions, the register must be divided into two parts, referred to as Part 1 and Part 2 of the register. To be eligible for Part 1, an individual (or association of individuals) must address the relevant requirements set out in regulations and any local eligibility conditions. If an individual (or association of individuals) addresses the relevant requirements set out in regulations but not a local connection test, then they are eligible for entry onto Part 2 of the register.

- 2.21. The duty to provide enough serviced plots to meet self-build demand, as set out in the Act, does not apply in relation to any person entered in Part 2 of the register. Only entries on Part 1 of the register count towards the number of suitable serviced plots that the council must grant development permission for. Relevant authorities must have regard to the entries on Part 2 when carrying out their planning, housing, land disposal and regeneration functions, for example, in plan-making the starting point for establishing overall demand for self-build and custom housebuilding would be the number of registrants on Part 1 and Part 2 of the register.
- 2.22. The Self-build and Custom Housebuilding (Time for Compliance and Fees) Regulations 2016 state that local authorities may charge a fee for a person to be entered onto the register; and thereafter, on an annual basis, to remain on that register irrespective of whether any fee was charged to be entered on the register. To date, Bromley has not introduced a fee.

Local connection test

- 2.23. Bromley exercised its option to introduce a local connection test in November 2020, but has not introduced any other local eligibility conditions at the time of writing. Bromley's local connection test requires applicants to demonstrate a local connection to the borough⁶ by demonstrating that they have been resident in the borough for a continuous period of five years, up to and including the day of application for entry onto the register.
- 2.24. The only legislative requirement relating to the introduction of local eligibility conditions is that the relevant authority must be publicise any conditions in the same manner as it publicises the self-build and custom housebuilding register. Bromley's local connection test was publicised in the same manner as the Bromley register, on the Council's website.
- 2.25. The Iceni Projects Technical Note (referred to in paragraph 2.8) makes a number of erroneous comments in relation to the local connection test, which I will discuss in turn.
- 2.26. Firstly, at page 2 of the Technical Note, Iceni Projects reference the PPG⁷, and refer to the process undertaken by Bromley when the local connection test was introduced:

"The PPG is clear that the introduction of a local connection test is expected to be introduced only where there is a strong justification for doing so and in response to a local recognised issue. However, Iceni does not consider that strong justification has been provided in this instance. In the paper submitted to the Development Control Committee (paragraph 3.11), the Council stated that:

⁶ An exception applies to persons in the service, or who have been in recent service of, the regular armed forces of The Crown.

⁷ Paragraph: 019 Reference ID: 57-019-20210208, Revision date: 08 02 2021

“Officers consider that a local connection test should be introduced. This will ensure that entrants on the Register have a genuine connection with the area and means that demand evidenced by the Register will be much more likely to be genuine rather than potentially one of many similar requests for entry onto registers in other areas.”

First, Iceni does not regard this as strong justification and it is clearly not a localised issue. If the Government had written the PPG with the expectation that strong justification could mean ensuring “entrants on the Register [having] a genuine connection with the area” then a local connection test would have been incorporated to the Act as standard given this could apply to all authorities in the Country – it is not a local issue.

- 2.27. I consider that Iceni Projects view on this element is wholly illogical, betraying a significant misunderstanding of how legislation and guidance operates.
- 2.28. The key point to note is that the requirements for the local connection test are ultimately governed by the Regulations. Section 5 of the Regulations clearly defer to the relevant authority in terms of setting a local connection test, giving it full discretion on whether to introduce a local connection test and the test criteria itself:

“5.—(1) A relevant authority may set criteria for eligibility for entry in the register in accordance with this regulation.

(2) A relevant authority may set a criterion whereby only individuals who meet such conditions as the authority reasonably considers demonstrate that the individual has sufficient connection with the authority’s area, are eligible (“a local connection test”).” (emphasis added)

- 2.29. As noted in paragraph 2.24 above, the only reference in the Regulations relating to the introduction of local eligibility conditions is that the relevant authority must publicise any conditions in the same manner as it publicises the self-build and custom housebuilding register, which Bromley Council has done. There are no other requirements set out, for example, no requirements relating to consultation on a proposed local eligibility condition; given the prevalence of specific consultation requirements in many other pieces of planning legislation, it would have been straightforward for the Government to introduce such a requirement. The fact that they have not strongly suggests that the Government’s intent is for relevant authorities to have broad discretion.
- 2.30. PPG⁸ provides guidance on the expectations for local authorities in introducing a local connection test:

“What local eligibility tests can a relevant authority set?”

⁸ Paragraph: 019 Reference ID: 57-019-20210208, Revision date: 08 02 2021; and Paragraph: 020 Reference ID: 57-020-20210508, Revision date: 08 02 2021

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) enables relevant authorities to include up to two optional local eligibility tests. These are limited to a local connection test and a financial solvency test. We expect that relevant authorities will apply one or both of these tests only where they have a strong justification for doing so.

Authorities are advised to ensure that they provide clear information to individuals and groups on the rationale underpinning local eligibility tests.

Relevant authorities are advised to consult on their proposals before they introduce an eligibility test, and to review them periodically to ensure that they remain appropriate and that they are still achieving the desired effect.

Paragraph: 019 Reference ID: 57-019-20210208

Revision date: 08 02 2021

What can the local eligibility tests look like?

It is for each relevant authority to determine the rationale for introducing a local eligibility test and hence the specific conditions set. Any eligibility test introduced by an authority needs to be proportionate, reasonable and reviewed periodically to ensure that it responds to issues in the local area, for example for areas with exceptional demand or limited land availability.

In designing a local connection test, relevant authorities may wish to consider criteria based on residency, having a family member residing in the local area and/or having an employment connection to the local area.

Aligning the test with local connection criteria used in local planning policies, for example relating to affordable housing or rural exception sites, may also be useful.

In designing a financial solvency test, relevant authorities may wish to assess whether the applicant can afford to purchase the land. Authorities should be aware that self-build and custom build can provide a route to affordable home ownership for those on low incomes and so will need to take this into consideration if introducing a financial solvency test.

When considering associations of individuals a relevant authority may wish to consider an association's collective ability to purchase a site and assume that each member can make an appropriate contribution.

Paragraph: 020 Reference ID: 57-020-20210508

Revision date: 08 02 2021"

- 2.31. As noted above, the PPG does not trump legislation, but notwithstanding this, the PPG itself is not strongly directive in terms of how a local connection test is put in place or what criteria are used. A relevant authority is 'expected' to have strong justification for imposing the test; is 'advised' to consult on proposals before they are introduced; and 'may wish' to consider specific issues when designing the test. This is not particularly strong language. Moreover, paragraph 020 of the PPG explicitly refers to the broad discretion that a relevant authority has relating to the introduction of a local connection test, noting that it is for each relevant authority to determine the rationale for introducing a local eligibility test and hence the specific conditions set. It is disappointing that Iceni Projects seem to have cherry-picked the PPG references in the Technical Note and have not made any reference to PPG paragraph 020; it is clearly relevant to the matter at hand, but I can only assume that as it is not helpful to their point, this is the reason it was not mentioned.
- 2.32. Iceni Projects consider that ensuring a genuine connection to an area is not strong justification for introducing a local connection test, and that the Government would have legislated for a local connection test to apply as standard if this was the case. I wholly disagree and refer to paragraph 020 of the PPG cited above; this makes it crystal clear that Government intention was to give local authorities discretion on the introduction of the test, hence why it would not have been set out in the Regulations. Paragraph 020 of the PPG also explicitly identifies criteria on residency as potentially forming part of any local connection test.
- 2.33. Notwithstanding my view on the dubious legal basis of Iceni Project's conclusions on the local connection test, I consider that the Bromley local connection test, in terms of how it was introduced and its design, is fully consistent with paragraphs 019 and 020 of the PPG anyway. The report to Bromley's Development Control Committee on 19 November 2020 [CD5.13], which I authored, sets out strong justification for the introduction of the test, including the point that the test would ensure that the register is reflective of actual meaningful demand. The test is considered proportionate and reasonable, taking into account relevant information. The test is based on residency (as proposed by the PPG) and it is aligned with a similar test in the Council's Housing Allocation Scheme⁹. In terms of the other guidance in the PPG, the Council have provided clear information on the Council website to explain the rationale underpinning the local connection test, including a link to the committee report.
- 2.34. The committee report notes that no consultation would be undertaken on the proposed local connection test; the report does not elaborate on reasons for this, but I note that the fact that consultation is not mandatory was a significant factor, as it was considered that prioritising resources for non-mandatory consultation was not the best use of resources at the time. I would also note that the committee report was written between COVID-19

⁹ I note that the PPG does suggest aligning the test with local planning policies, and acknowledge that the allocation scheme is not a planning policy. However, it is still considered to be a relevant proxy to inform the design of the local connection test.

lockdowns at a time when there were still significant restrictions in place that would have likely impacted on the effectiveness of a consultation exercise.

- 2.35. Lack of consultation on local connection tests does not seem to be unusual. I have found examples from the London Boroughs of Camden, Haringey, Harrow, Havering, Islington and Westminster where a local connection test was introduced without consultation. I have provided further details on the process undertaken by these boroughs at Appendix 2.
- 2.36. The Iceni Projects Technical Note refers to an appeal decision in Canterbury¹⁰ where an Inspector assessed Canterbury District Council's local connection test against the PPG. The inspector considered that the lack of consultation on the local connection test, and lack of information to demonstrate strong justification for the imposition of the test, created ambiguity about the level of self-build demand to be met. As a general point, I note that individual appeal decisions are not determinative as there are specific details and circumstances to be considered in each case. Regardless, I consider that the imposition of a local connection test is a completely separate matter from the determination of an appeal, governed by specific legislation (which I discuss above).
- 2.37. The fact that the appeal inspector in the Canterbury decision decided to comment on the merits of Canterbury's local connection test is curious, and in my opinion there would have been strong grounds for legal challenge based on the wording of that decision. It is akin to re-assessing the soundness of an adopted Local Plan policy as part of an appeal decision. In my opinion, the legislation is clear that the introduction of a local connection test is at the discretion of a relevant authority, and once imposed the suitability of the local connection test should not be assessed on a case by case basis thereafter. Bromley's local connection test was introduced in November 2020, in line with relevant legislation and following approval by elected members at a public meeting. Any person(s) who wished to challenge the introduction of the local connection test could have done so through the courts, but I note that no legal challenge was made.
- 2.38. A further issue relating to the local connection test raised by Iceni Projects is that the Borough effectively forms part of a wider London Housing Market Area and therefore it would be expected that individuals would apply to more than one register. Iceni Projects note that it is important that the Council recognises that London Housing Market Areas do not always respect local authority boundaries and that people may have connections with more than one Borough or indeed with one of the surrounding Districts.
- 2.39. This point has no merit. As I set out above, the Council has broad discretion (in the Regulations and PPG) relating to the introduction of a local connection test. The PPG clearly envisages restrictions relating to a specific area, for example, based on residency or employment; the test itself is called a local connection test. Even if people have a connection with more than one

¹⁰ Appeal reference: APP/J2210/W/20/3259181

borough, the notion of self-build means that they intend to build and live in one particular area. Taking Iceni Projects' argument to the extreme, without local eligibility conditions an individual could register for self-build with each of the 300+ relevant authorities in England, meaning that actual demand would be artificially inflated by over 30,000%.

- 2.40. I note that if the Government had intended for broader Housing Market Areas to be relevant to self-build demand, to allow individuals to register for self-build in more than one area, they could have identified strategic authorities such as the Greater London Authority as a relevant authority in the Act. This would have meant that London self-build registers were maintained on a London-wide basis.
- 2.41. To conclude on the local connection test, the points raised by Iceni Projects have no merit whatsoever and betray a significant misunderstanding about how self-build legislation operates. The Bromley local connection test was introduced in line with relevant legislative requirements, and clearly applies to any assessment of self-build demand in the borough. Notwithstanding this, even considering the local connection test against the non-statutory guidance in the PPG, the test is still justified.

Meeting demand from the Bromley self-build and custom housebuilding register

- 2.42. Table 1 sets out the level of demand from the Bromley self-build and custom housebuilding register across base periods 1 to 8. This splits the demand between Part 1 and Part 2. The numbers in red denote the relevant demand figure for each year, which informs the number of permissions that need to be provided. For base periods 1-5, this is the total figure (Part 1 and Part 2). For base period 6 onwards, this is the Part 1 figure, which reflects the introduction of the local connection test during this base period. Only base periods 1 to 5 are currently relevant in terms of meeting demand, as these are the only base periods where the full three year period to meet demand has elapsed. The three year period for base period 6 will elapse on 30 October 2024.
- 2.43. Table 1 also includes a column showing the position when the planning application was determined; there have been some minor changes to permissions that the Council relies on since this time, hence the need to explain this. A full list of the permissions which the Council relies on to meet self-build demand is provided at Appendix 1. This also includes commentary on any changes since the planning application determination.

Table 1: Information from Bromley self-build and custom housebuilding register (June 2024)¹¹

Base Period	Period covered	Entries on Part 1 of the register	Entries on Part 2 of the register	Total entries onto the register	Self-build permissions	Self-build permissions at application determination stage (for comparison)
1	1 April 2016 to 30 October 2016	0	0	0	9	10
2	31 October 2016 to 30 October 2017	4	32	36	14	14
3	31 October 2017 to 30 October 2018	2	20	22	17	17
4	31 October 2018 to 30 October 2019	4	25	29	14	16
5	31 October 2019 to 30 October 2020	1	18	19	13	13
6	31 October 2020 to 30 October 2021	9	56	65	14	13
7	31 October 2021 to 30	22	16	38	20	14

¹¹ The Iceni Projects Technical Note cites the latest DLUHC Right to Build monitoring figures (last publication date 31/03/2023) which differ from the figures in my Table 1, showing a lower level of demand. While the exact reason for the difference is unclear, I note that the DLUHC figures for the most recent Base Period (2021/22, up to Base Period 7) reflect my figures in Table 1, in terms of the total number of entries and the split between Part 1 and Part 2.

Base Period	Period covered	Entries on Part 1 of the register	Entries on Part 2 of the register	Total entries onto the register	Self-build permissions	Self-build permissions at application determination stage (for comparison)
	October 2022					
8	31 October 2022 to 30 October 2023	5	18	23	13	N/A
TOTAL		47	185	232	114	97 (BP1 to BP7)
Note: numbers in red denote the relevant demand figure for each year, which informs the number of permissions that need to be provided. For base periods 1-5, this is the total figure (Part 1 and Part 2). For base period 6 onwards, this is the Part 1 figure.						

- 2.44. From this table, the Council notes that there is a total demand for 106 self-build permissions across base periods 1-5. A self-build permission can only go toward meeting the demand for one plot; the Council have accounted for double counting in the calculation of the total figures.
- 2.45. With regard to identifying permissions to meet this demand, the Council considers that any planning permission for a new or replacement dwelling that has commenced and has a CIL Form 7 Part 1 exemption form¹² should be counted as a relevant permission for the purpose of meeting self-build demand. The Council has used the planning permission date as the relevant date to determine which base period the permission falls within.
- 2.46. By only counting permissions that have identified they are self-build and which have commenced, this gives a strong indication that the development will come forward as self-build. The legislative requirement is for sufficient permissions (not completions) to be provided. A CIL Form 7 Part 2 exemption form is submitted within 6 months of completion of a self-build dwelling; if we were to only count permissions that had a Part 2 form, this would be a de facto requirement that only self-build completions could be counted, which goes beyond the regulatory requirements.
- 2.47. PPG¹³ sets out the following guidance on how authorities can record suitable permissions:

How can authorities record suitable permissions?

¹² The Part 1 Form requires a declaration from the CIL liable party that the permission will be a self-build project and that the liable party will occupy the premises as their sole or main residence for a period of 3 years from completion of the property.

¹³ Paragraph: 038 Reference ID: 57-038-20210508, Revision date: 08 02 2021

“The legislation does not specify how suitable permissions must be recorded. However, the following are examples of methods a relevant authority may wish to consider to determine if an application, permission or development is for self-build or custom housebuilding:

- Whether developers have identified that self-build or custom build plots will be included as part of their development and it is clear that the initial owner of the homes will have primary input into its final design and layout;*
- Whether a planning application references self-build or custom build and it is clear that the initial owner of the homes will have primary input into its final design and layout; and*
- Whether a Community Infrastructure Levy or Section 106 exemption has been granted for a particular development.*

A relevant authority must be satisfied that development permissions being counted meet the legislative requirements.”

- 2.48. As is the case with other elements of the self-build register, relevant authorities have broad discretion about what development permissions count toward the demand from the register. PPG also confirms that the granting of a CIL exemption can be a determinant of whether an application is self-build; PPG does not specify that this requires both parts of the CIL form to be provided.
- 2.49. The Iceni Projects Technical Note ignores the final bullet point of paragraph 038 of the PPG, set out above, which refers to possible use of CIL exemption to denote a self-build permission, and instead references informal guidance from the Right to Build taskforce which suggests that a permission can only be regarded as “definitely” self and custom build supply when there is evidence of:
- A permission with a signed Unilateral Undertaking committing to self-build;
 - A permission with condition or agreement for marketing the plot(s) as a self and custom build opportunity; or
 - A permission that creates a new dwelling and has a submitted Form 7: Self Build Exemption Claim Form – Part 1 and Part 2.
- 2.50. The taskforce guidance is not official guidance; as noted above, the PPG is the relevant guidance which should inform this exercise, and this has no reference to the taskforce guidance.
- 2.51. The CIL self-build exemption can apply to extensions, but I note that the Council has undertaken detailed analysis of all self-build exemptions to ensure that only permissions for new and replacement dwellings and conversions are counted in Bromley’s figures; permissions for extensions which don’t result in a new dwelling are not counted. Iceni Projects have erroneously assumed, on page 4 of the Technical Note, that Bromley has

counted all CIL self-build exemptions, based on a misreading of the local connection test committee report, paragraph 3.7 [CD5.13].

- 2.52. Iceni Projects object to counting conversions as a self-build permission. However, I note that the PPG¹⁴ states that “a serviced plot of land could be an opportunity for converting an existing building to residential use (rather than a new build) provided the plot otherwise meets the statutory definition.” This clearly suggests that conversions, in principle, could be classed as self-build.
- 2.53. With regard to replacement dwellings, Iceni do not elaborate on why it is not appropriate to include these as a relevant permission, they merely state that replacement dwellings are not appropriate in the context of the Act. I strongly disagree and consider that it is perfectly legitimate to include replacement dwellings as a suitable permission for the purposes of addressing self-build demand (where the Part 1 CIL form has been provided and the development has commenced). The core purpose of the Act is to increase the delivery of self-build. Demolishing an existing dwelling and replacing it with a self-build home would clearly fulfil the purpose of the Act, as it has facilitated the delivery of a self-build home. I acknowledge that in housing supply terms, the result would be neutral, but increasing housing supply is not the overarching aim of the Act.
- 2.54. Taking into account the information on demand and supply above, I have set out (in Table 2) a breakdown of self-build demand and supply, in base periods 1-5, based on the figures provided in Table 1 above.

Table 2: self-build permissions provided in base periods 1-5

Base period	Total demand to be met	Number of self-build permissions from following 3 years (excluding permissions already counted toward meeting demand)
1 (1 April 2016 to 30 October 2016)	0	45 permissions from BP2, BP3 and BP4, but as there is no demand from the register, none of these permissions are counted towards meeting demand from BP1. 31 of these permissions are counted toward meeting demand from BP3 and BP4 (see below), which means that there is an excess of 14 permissions .
2 (31 October 2016 to 30 October 2017)	36	Demand met in BP2, from 17 permissions in BP3, 14 in BP4 and 5 in BP5 (totalling 36 permissions). This leaves an excess of 8 permissions from BP5 which can be relied on to meet demand from BP3 (see below).
3 (31 October 2017 to 30 October 2018)	22	Demand met in BP3, from 8 permissions in BP5 and 14 permissions in BP6 (totalling 22 permissions).
4 (31 October 2018 to 30 October 2019)	29	Demand partially met from 20 permissions in BP7 leaving an under-provision of 9 permissions in BP4.

¹⁴ Paragraph: 026 Reference ID: 57-026-20210508, Revision date: 08 02 2021

Base period	Total demand to be met	Number of self-build permissions from following 3 years (excluding permissions already counted toward meeting demand)
5 (31 October 2019 to 30 October 2020)	19	Demand partially met from 13 permissions in BP8 leaving an under-provision of 6 permissions in BP5.
Total	106	105 (made up from 14 permissions in BP1, 36 in BP2, 22 in BP3, 20 in BP4 and 13 in BP5)

- 2.55. The total number of permissions provided across the five base periods is 105; this includes over-provision of 14 permissions in base period 1. As the table demonstrates, the Council are only one permission short of meeting the self-build demand in full across base periods 1 to 5; this permission would carry over into the demand figure for base period 6, meaning that the Council would need to provide 10 permissions to meet demand from this base period (9 permissions from Part 1 in base period 6, plus the 1 unmet permission from base period 5).
- 2.56. In terms of individual base periods the Council has fully met demand from three of the five base periods. In addition, 9 self-build permissions were provided within base period 1 following the creation of the register; these permissions have not been counted towards the total figures but they provide further evidence of the Council's consistency in terms of permitting self-build units.

Demand from the Appellant

- 2.57. For context, I note that the Appellant has recently registered on the Bromley Self-build and Custom Housebuilding register. The following timeline sets out relevant dates related to the application for the register and subsequent entry onto the register:
- September 2022 – planning application (22/03243/FULL1) was validated, with no mention of the issue of self-build.
 - May 2023 – the Appellant belatedly raises the issue of self-build accompanied by submission of a Self-Build and Custom Housebuilding Technical Note (prepared by Icen Projects).
 - 7 May 2024 – the Appellant spoke to planning administration staff on the phone, querying an outstanding application for the Bromley self-build register which they claim was submitted in May 2023. This query was forwarded to Planning Policy on the afternoon of 7 May 2024. Officers checked previous self-build applications and correspondence, and could find no record of a previous application. I confirmed this in an email to the Appellant on 9 May 2024, but prior to my response, the Appellant submitted an application for the register on 7 May 2024.
 - 8 May 2024 – officers responded to the Appellant's application requesting further details to demonstrate that they met the local connection test. This additional information was provided later on 8 May 2024.

- 9 May 2024 – as noted above, I responded to the Appellant’s initial query about a self-build application they supposedly submitted in May 2023. Later on 9 May 2024, officers confirmed that the additional information submitted by the Appellant demonstrated that they met the local connection test, and that they had been entered onto Part 1 of the Bromley Self-build and Custom Housebuilding Register.

- 2.58. As set out in paragraph 2.14 above, the duty set out in Section 2A of the Act does not require authorities to provide serviced plots of land for each individual or association on the register; it is the total demand on relevant parts of the register that informs the level of serviced plots that need to be provided. Therefore, the fact that the Appellant is registered on Bromley’s self-build register does not place a requirement on the Council to permit a serviced plot specifically for the Appellant. It is the total demand on relevant parts of the register (which the Appellant forms part of) that informs the level of serviced plots that need to be provided.
- 2.59. I note that the Appellant was registered in Base Period 9. The Council has until 30 October 2027 to meet the total demand from Base Period 9.

Conclusion on weight to be given to self-build and custom housebuilding

- 2.60. To conclude, if an application is proposing a self-build dwelling and this can be secured through a legal agreement as part of the application process, then weight could be given to self-build as part of the determination. Without this being formally secured at the point of determination, there would be no guarantee that the unit would come forward as self-build.
- 2.61. A self-build dwelling would be consistent with national policy and guidance, and Policy H2 and objective GG4 of the London Plan.
- 2.62. The level of weight also depends on the extent to which self-build demand is being met with reference to entries on the self-build register, and considering the Council’s track record of meeting self-build demand over past base periods.
- 2.63. Taking all these factors into account, I consider that moderate weight should be given to the proposed provision of one self-build unit, where this is secured through legal agreement. If this provision is not formally secured, then no weight should be given to the proposed provision of a self-build unit.

Appendix 1: list of self-build and custom housebuilding permissions

This table provides a full list of the permissions which the Council relies on to demonstrate that it is meeting self-build demand. As noted in paragraph 2.45 of this proof, the Council considers that any planning permission for a new or replacement dwelling that has commenced and has a CIL Form 7 Part 1 exemption form should be counted as a relevant permission for the purpose of meeting self-build demand. The table provides the planning application reference number and address; the planning permission date; the base period within which the permission is counted, based on the planning permission date; and commentary on any changes since the permissions were initially assessed in June 2023, to inform the planning application determination.

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
16/01216/FULL1 - Rivenhall, Holwood Park Avenue, Orpington, BR6 8NG	05/05/2016	1	Removed from BP1 - superseded by 18/02282/RECON which is included in BP3
15/04442/FULL1 - 17 The Meadow, Chislehurst, BR7 6AA	26/05/2016	1	BP1 - no change from previous
16/01530/FULL1 - 28 Wickham Way, Beckenham, BR3 3AF	06/06/2016	1	BP1 - no change from previous
16/01988/FULL1 - Lotus Cottage Farm, Thrift Lane, Cudham, Sevenoaks, TN14 7NQ	20/06/2016	1	BP1 - no change from previous
15/04368/FULL1 - 11 Priory Avenue, Petts Wood, Orpington, BR5 1JE	23/06/2016	1	BP1 - no change from previous
15/03402/FULL3 - Land Adjacent To Redwood, The Drive, Chislehurst	14/07/2016	1	BP1 - no change from previous
16/02135/FULL1 - 51 Forest Drive, Keston, BR2 6EE	19/07/2016	1	BP1 - no change from previous
16/02506/FULL1 - High Gable, Hazel Grove, Orpington, BR6 8LU	25/07/2016	1	BP1 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
16/03654/FULL1 - Woodlands, Holwood Park Avenue, Orpington, BR6 8NQ	14/10/2016	1	BP1 - no change from previous
16/03853/FULL1 - 9 Julian Road, Orpington, BR6 6HT	19/10/2016	1	BP1 - no change from previous
16/04231/FULL1 - Liguanea, Woodlands Road, Bickley, Bromley, BR1 2AP	15/11/2016	2	BP2 - no change from previous
16/04314/FULL1 - Candle Hill, Raggleswood, Chislehurst, BR7 5NH	18/11/2016	2	BP2 - no change from previous
16/04943/FULL1 - 13 Mada Road, Orpington, BR6 8HQ	28/12/2016	2	BP2 - no change from previous
16/04430/FULL1 - 195 Worlds End Lane, Orpington, BR6 6AT	18/01/2017	2	BP2 - no change from previous
16/05877/FULL1 - 1 Wimborne Way, Beckenham, BR3 4DJ	10/03/2017	2	BP2 - no change from previous
17/00963/FULL1 - 11A Heathfield, Chislehurst, BR7 6AF	24/04/2017	2	BP2 - no change from previous
17/00988/FULL1 - Jason, Yester Road, Chislehurst, BR7 5HN	12/05/2017	2	BP2 - no change from previous
17/00607/FULL1 - Trowmers, Luxted Road, Downe, Orpington, BR6 7JS	12/05/2017	2	BP2 - no change from previous
16/04578/FULL1 - Millfield, Ashmore Lane, Keston, BR2 6DJ	16/05/2017	2	BP2 - no change from previous
16/04560/FULL1 - 7 Elmstead Glade, Chislehurst, BR7 5DX	30/05/2017	2	BP2 - no change from previous
17/01523/FULL1 - 2 Crow Hill, Rookery Road, Downe, Orpington, BR6 7JE	26/06/2017	2	BP2 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
17/00382/FULL1 - 55 Kechill Gardens, Hayes, Bromley, BR2 7NB	19/07/2017	2	BP2 - no change from previous
17/02645/FULL1 - 84 Craven Road, Orpington, BR6 7RT	03/08/2017	2	BP2 - no change from previous
16/05881/FULL1 - 4 Pleydell Avenue, Anerley, London, SE19 2LP	26/10/2017	2	BP2 - no change from previous
17/00812/FULL1 - 24 Downs Hill, Beckenham, BR3 5HB	23/11/2017	3	BP3 - no change from previous
17/04628/FULL1 - Redcot, The Hillside, Orpington, BR6 7SD	12/12/2017	3	BP3 - no change from previous
17/05402/RECON - 30 Oxenden Wood Road, Orpington, BR6 6HP	22/01/2018	3	BP3 - no change from previous
17/05865/FULL1 - 26 Homestead Road, Orpington, BR6 6HW	20/02/2018	3	BP3 - no change from previous
17/05156/FULL1 - 56 Harvest Bank Road, West Wickham, BR4 9DJ	27/02/2018	3	BP3 - no change from previous
18/00220/FULL1 - 106 Elwill Way, Beckenham, BR3 6RX	14/03/2018	3	BP3 - no change from previous
18/00637/FULL1 - 13 Oxenden Wood Road, Orpington, BR6 6HR	05/04/2018	3	BP3 - no change from previous
18/00476/FULL1 - 13 Barnfield Wood Road, Beckenham, BR3 6SR	06/04/2018	3	BP3 - no change from previous
18/01344/FULL1 - 77 Lovibonds Avenue, Orpington, BR6 8EP	25/05/2018	3	BP3 - no change from previous
18/01637/FULL1 - Arlington House, Nash Lane, Keston, BR2 6AP	01/06/2018	3	BP3 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
18/01451/FULL1 - 46 Camden Park Road, Chislehurst, BR7 5HF	04/06/2018	3	BP3 - no change from previous
18/00640/FULL1 - 107 Plaistow Lane, Bromley, BR1 3AR	18/06/2018	3	BP3 - no change from previous
17/05686/DET - Woodhill Farm, Norsted Lane, Orpington, BR6 7PQ	20/06/2018	3	BP3 - no change from previous
17/04411/FULL1 - 238 Main Road, Biggin Hill, TN16 3BD	18/07/2018	3	BP3 - no change from previous
18/02366/FULL1 - 17 Park Farm Road, Bromley, BR1 2PE	29/08/2018	3	BP3 - no change from previous
18/02945/FULL1 - Harboro, Wilderness Road, Chislehurst, BR7 5EZ	31/08/2018	3	BP3 - no change from previous
18/02282/RECON - Rivenhall, Holwood Park Avenue, Orpington, BR6 8NG	28/09/2018	3	BP3 - no change from previous
18/04193/FULL1 - Renniks Stud, Buckhurst Road, Westerham, TN16 2HS	20/11/2018	4	BP4 - no change from previous
18/01021/FULL1 - 36 Ashfield Lane, Chislehurst, BR7 6LQ	17/01/2019	4	BP4 - no change from previous
18/05137/FULL1 - 21 Beechcroft, Chislehurst, BR7 5DB	18/01/2019	4	BP4 - no change from previous
19/00025/FULL1 - 4 Oxenden Wood Road, Orpington, BR6 6HR	07/03/2019	4	BP4 - no change from previous
19/00106/FULL1 - Norlands Gate, Norlands Crescent, Chislehurst, BR7 5QY	11/03/2019	4	BP4 - no change from previous
18/02966/FULL1 - 67 Wickham Way, Beckenham, BR3 3AH	14/03/2019	4	BP4 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
18/03343/FULL1 - 32 Meadow Way, Orpington, BR6 8LW	08/05/2019	4	BP4 - no change from previous
18/05436/RECON - Land Adjacent Moorcroft House, 18 Wilderness Road, Chislehurst	13/05/2019	4	BP4 - no change from previous
19/01348/FULL1 - 50 Petersham Drive, Orpington, BR5 2QE	14/06/2019	4	BP4 - no change from previous
19/00617/FULL1 - 8 The Woodlands, Orpington, BR6 6HL	11/07/2019	4	BP4 - no change from previous
19/02525/FULL1 - 88 Chelsfield Lane, Orpington, BR5 4PZ	06/08/2019	4	BP4 - no change from previous
19/02371/FULL1 - Elmfield Court, Westgate Road, Beckenham, BR3 5EA	15/08/2019	4	BP4 - no change from previous
18/00835/RECON - Home Farm, Kemnal Road, Chislehurst, BR7 6LY	20/08/2019	4	BP4 - no change from previous
19/03181/FULL1 - Land Adjacent To, 27 Edward Road, Bromley	19/09/2019	4	Removed from BP4 - superseded by 22/01279 which is included in BP7
18/03957/FULL1 - 30 Forest Ridge, Keston, BR2 6EQ	29/10/2019	4	BP4 - no change from previous
18/05526/FULL1 - Squirrels Chase, Lodge Road, Bromley, BR1 3ND	20/05/2019	4	Removed from BP4 - superseded by 19/03024 which is included in BP5
19/03024/FULL1 - Squirrels Chase, Lodge Road, Bromley, BR1 3ND	08/11/2019	5	BP5 - no change from previous
19/03652/FULL1 - Wootton, Bullers Wood Drive, Chislehurst, BR7 5LS	18/11/2019	5	BP5 - no change from previous
18/05112/FULL1 - Land Rear Of 15 - 21, Commonsides, Keston	26/11/2019	5	BP5 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
19/04340/FULL1 - Fleur De Lys, Berrys Green Road, Berrys Green, Westerham, TN16 3AH	28/11/2019	5	BP5 - no change from previous
19/04658/FULL1 - 2 Styles Way, Beckenham, BR3 3AJ	03/02/2020	5	BP5 - no change from previous
19/04972/FULL1 - 3 Wiverton Road, Sydenham, London, SE26 5JA	25/02/2020	5	BP5 - no change from previous
19/05163/FULL1 - 7 Windsor Drive, Orpington, BR6 6EY	06/03/2020	5	BP5 - no change from previous
19/05306/FULL1 - 16 Forest Drive, Keston, BR2 6EF	01/04/2020	5	BP5 - no change from previous
20/00476/FULL1 - 41 Anerley Road, Penge, London, SE19 2AS	27/05/2020	5	BP5 - no change from previous
20/01358/FULL1 - Land Rear Of 45 Bromley Common, Heron Court, Bromley	09/06/2020	5	BP5 - no change from previous
20/01533/FULL1 - 21 The Meadows, Orpington, BR6 6HS	27/07/2020	5	BP5 - no change from previous
20/02430/FULL1 - Pen-Y-Bryn, Chelsfield Hill, Orpington, BR6 7SL	17/09/2020	5	BP5 - no change from previous
20/01445/FULL1 - 183 Worlds End Lane, Orpington, BR6 6AT	27/10/2020	5	BP5 - no change from previous
20/02660/FULL1 - 223 Worlds End Lane, Orpington, BR6 6AT	04/11/2020	6	BP6 - no change from previous
20/02995/FULL1 - 188 Worlds End Lane, Orpington, BR6 7SS	19/11/2020	6	BP6 - no change from previous
20/02453/FULL1 - Shirley, Holwood Park Avenue, Orpington, BR6 8NG	17/12/2020	6	BP6 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
19/04193/FULL1 - 301 Crofton Road, Orpington, BR6 8EZ	08/01/2021	6	BP6 - no change from previous
20/04443/FULL1 - 8 Julian Road, Orpington, BR6 6HU	22/01/2021	6	BP6 - no change from previous
20/03301/FULL1 - 1 Riverwood Lane, Chislehurst, BR7 5QN	29/01/2021	6	BP6 - no change from previous
20/04356/FULL1 - Deneside, Orchard Road, Pratts Bottom, Orpington, BR6 7NS	01/02/2021	6	BP6 - no change from previous
20/02627/FULL1 - Tanglewood Farm, Skibbs Lane, Orpington, BR5 4HA	25/02/2021	6	BP6 - no change from previous
20/04890/FULL1 - 225 Worlds End Lane, Orpington, BR6 6AT	19/03/2021	6	BP6 - no change from previous
20/05255/DET - 25 Goodmead Road, Orpington, BR6 0HX	14/05/2021	6	BP6 - no change from previous
20/01482/FULL1 - 15 Woodland Way, West Wickham, BR4 9LL	15/06/2021	6	BP6 - no change from previous
21/00644/FULL1 - 221 Worlds End Lane, Orpington, BR6 6AT	19/07/2021	6	BP6 - no change from previous
21/00626/FULL1 - 73 Kynaston Road, Orpington, BR5 4JY	13/10/2021	6	BP6 - no change from previous
21/01200/FULL1 - 3 Orchard Road, Bromley, BR1 2PR	04/06/2021	6	Additional permission not included in June 2023 list
21/03568/FULL1 - Land Adjacent To 15, Sandy Bury, Orpington	09/11/2021	7	Additional permission not included in June 2023 list
20/04441/FULL1 - 2 Plantation Drive, Orpington, BR5 4NY	24/11/2021	7	BP7 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
21/04095/FULL1 - 38 Parkside Avenue, Bickley, Bromley, BR1 2EJ	15/12/2021	7	BP7 - no change from previous
21/03075/FULL1 - Pucks Cottage, Hazel Grove, Orpington, BR6 8LU	20/12/2021	7	BP7 - no change from previous
21/04154/FULL1 - 1 Sandiland Crescent, Hayes, Bromley, BR2 7DP	23/12/2021	7	BP7 - no change from previous
21/03050/DET - 18 Wood Drive, Chislehurst, BR7 5EU	23/03/2022	7	BP7 - no change from previous
22/00066/FULL1 - 66 Avondale Road, Bromley, BR1 4EZ	24/03/2022	7	BP7 - no change from previous
21/05533/FULL1 - 6 Longdon Wood, Keston, BR2 6EW	11/05/2022	7	BP7 - no change from previous
21/02697/FULL1 - 11 Homesdale Road, Petts Wood, Orpington, BR5 1JS	12/05/2022	7	BP7 - no change from previous
22/01279/FULL1 - Land Adjacent To, 27 Edward Road, Bromley	17/05/2022	7	Additional permission not included in June 2023 list
21/03625/FULL1 - 17 Ninhams Wood, Orpington, BR6 8NJ	26/05/2022	7	BP7 - no change from previous
21/00925/FULL1 - Holmwood, Berrys Green Road, Berrys Green, Westerham, TN16 3AJ	01/06/2022	7	Additional permission not included in June 2023 list
22/01495/FULL1 - 24 St Winifred's Road, Biggin Hill, TN16 3HP	09/06/2022	7	BP7 - no change from previous
22/01787/FULL1 - 17 Melbury Close, Chislehurst, BR7 5ET	29/06/2022	7	BP7 - no change from previous
22/01222/FULL1 - 21 Bromley Avenue, Bromley, BR1 4BG	20/07/2022	7	BP7 - no change from previous

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
22/01690/FULL1 - Woodlands, 6 Westleigh Drive, Bromley, BR1 2PN	25/07/2022	7	Additional permission not included in June 2023 list
20/05000/FULL1 - Toppers Oak, Kemnal Road, Chislehurst, BR7 6LT	04/08/2022	7	Additional permission not included in June 2023 list
22/02314/DET - 94 Towncourt Lane, Petts Wood, Orpington, BR5 1EJ	06/10/2022	7	BP7 - no change from previous
22/01141/FULL1 - Glendale, Holwood Park Avenue, Orpington, BR6 8NG	26/10/2022	7	BP7 - no change from previous
22/01212/FULL1 - 27 Blandford Road, Beckenham, BR3 4NE	20/05/2022	7	Additional permission not included in June 2023 list
22/04253/FULL1 - Huntington Place, Chislehurst Road, Chislehurst, BR7 5LE	20/01/2023	8	Added as part of new BP8 information
22/03628/FULL1 - 2 Julian Road, Orpington, BR6 6HU	24/02/2023	8	Added as part of new BP8 information
22/05035/FULL1 - 2 Hayes Close, Hayes, Bromley, BR2 7BZ	21/03/2023	8	Added as part of new BP8 information
22/03911/FULL1 - Land North Of 1 Park Hill, Southborough Road, Bickley, Bromley	20/04/2023	8	Added as part of new BP8 information
22/04517/FULL1 - Ridgeway, Yester Park, Chislehurst, BR7 5DG	11/05/2023	8	Added as part of new BP8 information
22/01536/FULL1 - Farrago, 35 Park Avenue, Farnborough, Orpington, BR6 8LH	18/05/2023	8	Added as part of new BP8 information
22/02719/FULL1 - Hill Cottage, Farnborough Hill, Orpington, BR6 7EE	23/05/2023	8	Added as part of new BP8 information
23/01568/FULL3 - 20 Crescent Road, Beckenham, BR3 6NE	22/06/2023	8	Added as part of new BP8 information

Planning permission reference and address	Planning permission decision date	Planning permission decision base period	Comments
23/01316/FULL1 - 24 Randolph Road, Bromley, BR2 8PU	23/06/2023	8	Added as part of new BP8 information
23/00886/FULL1 - 20 Friar Road, Orpington, BR5 2BN	26/06/2023	8	Added as part of new BP8 information
23/00513/FULL1 - Lynwood, Pines Road, Bickley, Bromley, BR1 2AA	21/07/2023	8	Added as part of new BP8 information
23/01225/FULL1 - Land At, Grangewood Lane, Beckenham	05/09/2023	8	Added as part of new BP8 information
21/00491/FULL1 - 1 Beech Dell, Keston, BR2 6EP	04/11/2022	8	Added as part of new BP8 information

Appendix 2: Local connection test adoption process for other London Boroughs

Borough	Comments and link to committee report
Camden	No consultation on local connection test. Committee report sets out several reasons for not consulting, including that the relevant legislation does not require consultation on Local Eligibility Conditions - https://democracy.camden.gov.uk/documents/s69774/Self-build%20and%20custom%20housebuilding%20register%20report.pdf
Haringey	No consultation on local connection test. Committee report considers that consultation is not necessary as it is unlikely to provide more accurate evidence or raise matters not previously considered - https://www.minutes.haringey.gov.uk/documents/s111167/SelfBuildRegisterCttReportFINAL.doc_18.46.pdf
Harrow	No consultation recommended as part of decision to introduce a local connection test - https://moderngov.harrow.gov.uk/documents/s160588/Cabinet%20Report%20-%20Self%20Build.pdf
Havering	No consultation recommended as part of decision to introduce a local connection test - https://democracy.havering.gov.uk/documents/s66366/126.%20Non-Key%20ED_Self-build%20eligability%20criteria%20and%20fee%20FINAL%20Signed.pdf
Islington	No consultation recommended as part of decision to introduce a local connection test - https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/information/guidance/20162017/20161104islingtonselfbuildandcustomhousebuildingregisterlocaleligibilityconditionsguidancenote.pdf
Westminster	No consultation recommended as part of decision to introduce a local connection test - https://committees.westminster.gov.uk/documents/s30898/Charging%20for%20Self%20Build%20Register%20entries.pdf