London Borough of Bromley

Explanatory Note Housing Need and Supply

Set out below is a summary of the housing need and housing supply position for Bromley which is set out in Chapter 2 Living in Bromley, Draft Policy 1 Housing Supply, paragraphs 2.1.1 – 2.1.22 (and Appendix 10.1) of the Proposed Submission Draft Local Plan (2016). This explains the position of the borough in the context of the wider area of London and the London Plan 2016. The London Plan sets out the approach to housing supply in paragraphs 3.13 – 3.26, Policy 3.3 and Table 3.1. Table 3.1 identifies the annual average housing supply monitoring target 2015 – 2025 of 641 units per annum for Bromley borough.

Objectively Assessed Housing Need

London Strategic Housing Market Assessment 2013

The London Plan explains in Chapter 3 that the average annual minimum housing supply targets for each of the 33 London boroughs are informed by the need for housing as evidenced by the GLA’s 2013 Strategic Housing Market Assessment (SHMA) and London’s housing land capacity through the 2013 Strategic Housing Land Availability Assessment (SHLAA). Therefore housing need and capacity is assessed on a London-wide basis resulting in realistic housing capacity figures for each of the boroughs.

The London Plan sets out that although there are differences in the type, quality and cost of housing across London the complex linkages between them mean that for planning purposes London should be treated as a single housing market.

The 2015 – 2036 figure of 49,000 additional homes per annum provides the basis for the detailed housing need figures in the London Plan. This figure is regarded as a minimum.

The general approach within the London Plan in relation to the assessment of housing need and capacity is considered to be consistent with the National Planning Policy Framework (including paragraph 47) and takes into account London’s locally distinct circumstances of the pressing need for housing and limited land availability, aiming to deliver sustainable development.

South-East London Strategic Housing Market Assessment June 2014

A sub-regional SHMA was finalised in June 2014 for five south-east London boroughs (Bexley, Bromley, Greenwich, Lewisham and Southwark). The timing of the sub regional SHMA is important having been finalised at a similar time to the Further Alterations to the London Plan (FALP) examination that was approaching in September 2014. The sub-regional SHMA referenced the FALP average annual housing supply targets in the context of need within the sub-region. It was compiled in the context of the boroughs being part of London and informed by London Plan housing targets.

As set out in the Proposed Submission Draft Local Plan the sub-regional SHMA 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 London SHLAA reach 7893 units.

GLA household projections in 2014 estimated an annual short term variant of 1840 households per annum for the Borough and a long term variant of 1530 households per annum.

**Housing Supply and Capacity**

**London Strategic Housing Land Availability Assessment 2013**

As set out in the Proposed Submission Draft Local Plan 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 across the whole of London 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 SHLAA’s nationally.

As part of the London-wide process all London boroughs undertook individual assessments of sites of 0.25ha identified through the SHLAA software. These sites represented large sites within the Assessment. The large sites can be categorised into sites with planning permission, allocations and confidential sites that were considered in light of their size of 0.25ha or more. The GLA’s 2013 SHLAA made available details of sites in the public domain but not confidential sites. The assessment of large sites was largely probability based unless informed by unit numbers agreed through planning permissions or allocations. A review of small sites completion data since 2004 was also undertaken to inform future windfall targets for the boroughs. In addition to this consideration was given to the contribution that non-self-contained sites might make to future supply.

The London Plan (2016) includes a minimum borough annual average housing target at Table 3.1 (London Plan Policy 3.3) that is relevant to the borough. The annual monitoring target for Bromley Borough is 641 dwellings per annum. The Mayor for London has indicated that the current London Plan will be reviewed and replaced by 2019. For the purposes of the Draft Local Plan, the base date for residential development policy is the same as The London Plan (2016), that is April 2015 (2015/2016).

The trajectory at Appendix 10.1 of the Draft Local Plan sets out the anticipated sources of housing supply over the Plan period.

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) in Bromley. The figure for housing provision is 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).
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. Paragraph 1.1.29 states 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. Boroughs are also 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.

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.

Local Plan Call for Sites and Site Assessments

As part of the Local Plan process the Council undertook a call for sites in February 2014 to establish if there were any sites that might be suitable for allocation, including residential uses. Draft allocations were consulted on in September 2015 as part of the Draft Allocations, further policies and designations consultation and November 2016 within the Proposed Submission Draft Local Plan.

The Council’s SHLAA comprises:

GLA’s 2013 SHLAA supported by;
Bromley Town Centre Area Action Plan 2010;
Housing trajectory included in the draft Local Plan;
Council’s Five Year Housing Land Supply Paper November 2016 and;
Updated Site Assessments August 2017.

The key sites and broad locations identified have the potential to deliver over 3800 units over the Plan period.

The key 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 Opportunity Area.

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.

Housing delivery 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.