

Bromley Local Plan Examination

Inspector's Matters, Issues and Questions

Issue 1: Have the relevant procedural and legal requirements been met, including the duty to co-operate and those required by the Conservation of Habitats Regulations 2010?

3) Has the Council engaged constructively, actively and on a continuing basis with all of the bodies required by the Duty to Co-operate, including the strategic matter of housing with LB Croydon and development at Biggin Hill with Tandridge District Council?

The London Plan is not a development plan document. For this reason the Mayor has argued that the legal duty to cooperate does not apply to the London Plan. Instead, the constituent London Boroughs (and the two development corporations) are responsible for discharging the duty to cooperate.

The NPPG observes:

“Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.”

Paragraph 178 of the NPPF states that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities. Strategic priorities are those matters, such as homes, employment and infrastructure, that cut across local boundaries. One such matter would be responsibility for planning for London's unmet strategic housing need – a figure that amounts to at least 7,000 homes a year – i.e. the difference between the London-wide OAN of 49,000 homes a year and an identified capacity for just 42,000 homes a year. At present, because the London Plan is not defined as a local plan in the legislation, no one is taking responsibility for planning for the strategic unmet housing need – not the Mayor and not the London boroughs.

The NPPG explains at paragraph 9-007-20140306:

“The degree of cooperation needed between the boroughs will depend on the extent to which strategic issues have already been addressed in the London Plan. Cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively.”

Despite this clear guidance, Bromley Council has done nothing to manage the strategic shortfall, or the shortfall against its own local assessment of need. It has therefore failed the duty to cooperate.

The London Plan in Policy 2.2E, reflecting the NPPG (ID 9-007-20140306), and paragraph 2.14 of the London Plan, are clear that responsibility for discharging the duty to cooperate resides with the individual London Boroughs. London Plan Policy 2.2E is clear that this has special significance for the outer London boroughs.

Housing is a strategic matter. The London Plan has a strategic unmet housing need that amounts to at least 7,000 homes a year (see our response to *Issue 5: Housing* for further evidence to support this). The London Plan housing targets in Table 3.1 are minimum strategic benchmark targets that the London Boroughs are encouraged to exceed, and these higher targets should be supported by NPPF compliant assessments of housing need undertaken locally (Policy 3.3Da).

Table 2.11 from the South East London SHMA 2014 is reproduced below. This shows that relatively significant outward migration from Bromley to the non-London borough of Sevenoaks (see also paragraph 2.42). This trend will increase as a consequence of a) the Mayor of London’s migration assumptions that underpin the current London Plan (2015); b) because Bromley has a housing requirement which is set by the London Plan that is significantly below the DCLG’s projected level of household formation; and c) because of under-delivery across London as a whole which means that under-supply relative to the projected level of formation in Bromley will not be compensated for elsewhere.

Table 2.11 Main migration linkages

Top 5 outward destinations	Bexley	Bromley	Greenwich	Lewisham	Southwark
	Greenwich	Croydon	Bexley	Bromley	Lewisham
	Dartford	Lewisham	Lewisham	Greenwich	Lambeth
	Bromley	Sevenoaks	Bromley	Southwark	Greenwich
	Sevenoaks	Bexley	Southwark	Lambeth	Wandsworth
	Medway UA	Greenwich	Dartford	Croydon	Bromley
Top 5 inward origins	Greenwich	Lewisham	Lewisham	Southwark	Lambeth
	Lewisham	Croydon	Bexley	Greenwich	Lewisham
	Dartford	Southwark	Southwark	Lambeth	Wandsworth
	Bromley	Greenwich	Lambeth	Bromley	Tower Hamlets
	Southwark	Lambeth	Bromley	Croydon	Westminster

Source: ONS Annual Population Survey 2010, 2011 *Average of 2010 and 2011

The issue of the Mayor of London’s alternative migration trends is a problem, because it is left to the individual London boroughs to resolve the issue. The NPPG Reference ID 2a-018-20140306, states:

“Any cross-boundary migration assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local authority under the duty to cooperate.”

London as a whole has assumed a lower migration figure and this means increased housing pressure for the rest of the South East of England. Unfortunately, Bromley

Council is responsible for agreeing the Mayor's alternative migration assumptions with all the authorities of the South East.

Unfortunately, the Bromley Local Plan is unsupported by any proper evidence that the Council has endeavoured to try to accommodate an element of the London Strategic unmet housing need through discussion with authorities outside of London, in particular the local authorities of Tandridge and Sevenoaks who share the strongest housing market area relationships with Bromley. We note the AMR for 2014-2016. Page six includes a summary of actions under the duty to cooperate. It provides little information of substance to demonstrate what Bromley has endeavoured to do try and find a solution to the problem of London's own unmet housing needs, as well as its own local evidence of unmet housing needs.

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Issue 5: Are the policies for housing growth and affordable housing justified, deliverable and consistent with national policy?

The London Plan establishes the minimum strategic benchmark housing target for the London boroughs. London Plan Policy 3.3Da, and supporting paragraph 3.18, are clear that the London Boroughs need to undertake their own local NPPF compliant assessments of housing need to explore how these targets may be augmented to increase housing supply and help to close the gap in London (paragraph 3.19 of the London Plan) – that is the identified capacity of 42,000dpa and the lower end of the OAN for London of 49,000dpa. The OAN of 49,000dpa, is, as paragraph 3.16b of the London Plan explains, the minimum number of homes to be planned for. The figure of 62,000dpa represents the level of supply that the Greater London Authority (GLA) has calculated as needed to address the backlog that has accumulated between 2011 to 2015 more quickly.

It is clear that Bromley Council relies entirely on meeting the minimum requirement of 641dpa for general conformity with the London Plan. This, however, is unsound, since it fails to address the requirement in the London Plan to explore how more homes can be provided, and the requirement of the NPPF to assess objectively housing needs and then meet this need in full. The Council has failed to act in the spirit of the NPPF to 'boost significantly' the supply of housing, or to comply with the policies in the London Plan which clearly explains that the targets in Table 3.1 are starting point figures and that the London local planning authorities must augment these figures with additional supply. As the Mayor's *Housing SPG* states in paragraph 1.1.11:

"To ensure general conformity with Policy 3.3, all boroughs will need to show in their Local Plans, housing trajectories and/or supporting evidence that they have sought to identify and bring forward extra housing capacity, above minimum housing targets."

16) Is the Council content that housing need has been assessed looking at London's needs as a whole?

The London Plan treats London as a whole as a single housing market area. The GLA assesses the housing need for London as a whole and then divides this total figure up based on assessments of capacity. In some senses this it makes sense to treat London as a single housing market area, but it also stretches credibility to imagine that Bromley is isolated from Kent, even though it shares a Kent postcode and is part of Kent County Council for the purposes of the local education authority. The Council's evidence base shows that there are significant housing market moves between Bromley and Sevenoaks.

Furthermore, it is important to recognise that the housing targets for the GLA are not based on an NPPG-advised approach to assessing the OAN. The GLA OAN of

49,000dpa is merely a demographic projection – and a heavily discounted one at that, as the GLA SHMA 2013 demonstrates. The Mayor of London, because of his migration assumptions, assumes that the demographic starting point is much lower than the DCLG projections that were available at the time (the 2011-interim Household Projections). The Mayor of London assumes that 39,500 household will form each year, compared to the 2011-interim household projections that modelled 52,000 household per annum. Interesting, the NPPG is clear, that if local authorities are assuming different migration trends, then this will need to be agreed with the other authorities. As the NPPG states (ref 2a-018-20140306):

“Any cross-boundary assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local planning authority under the duty to cooperate. Failure to do so will mean that there would be an increase in unmet housing need.”

If the Mayor has not secured the consent of the authorities outside of London for his migration assumptions that have the effect of pulling the demographic starting point down from 52,000 household per year to 39,500hph, then the need in London, and Bromley, will be potentially much higher. The Mayor’s migration assumptions will only come to pass if the local authorities outside of London make a conscious effort through their plans to increase their levels of housing provision to compensate for these alternative trends. Unfortunately they are not.

The NPPG also requires plan-makers to consider other factors when assessing the OAN, such as market signals, aligning housing supply with employment projections, increasing supply to facilitate affordable housing delivery, etc. The Mayor’s OAN does not do this. This is why a local assessment of need is so important. The GLA was mindful that because the London Plan is not a development plan document, it could not supplant the need for the London local planning authorities to undertake NPPF-compliant assessments of need. This is what the London Plan in Policy 3.3Da refers to. So does the Mayor’s Housing SPG (paragraph 1.1.8).

Bromley has undertaken a SHMA in 2014. Alarming, it was only made available after the Regulation 19 consultation concluded. It is a good report but somewhat dated. For example, it does not take into account the more recent household projections, as required by the NPPF (with further guidance provided by the NPPG). The DCLG 2014 Household Projections, published in 2016, indicate that some 18,000 households are projected to form between 2015-2025, or 1,80hpa. Clearly, this figure is considerably in excess of the Council’s target of 641dpa and the Council’s own OAN of 1,317dpa (reflecting the Mayor’s Central Variant and an adjustment for vacancies).

The *South East London Strategic Housing Market Assessment* June 2014 study adopts the Mayor of London’s migration assumptions by using the Central Variant. This is explained in paragraphs 5.28 to 5.33.

Table 5.3 sets out the projected household formation under the Mayor’s Central Variant demographic projection. This shows, that even using the Mayor of London’s heavily discounted demographic projections, the demographic starting point for Bromley, is 1,191 households per annum. Even without further adjustments for

second homes/vacants, market signals, the economy, affordable housing need etc, this is a level of basis housing need that is far in excess of the London Plan benchmark target of 641dpa.

Table 5.3 Projected household change 2011-2031

	Households			Total	Increase 2011-2031 Annual average	Average hhd size	
	2011	2021	2031			2011	2031
London	3,278,340	3,738,132	4,104,484	826,144	41,307	2.48	2.37
South East							
London	562,894	633,689	692,180	129,286	6,464	2.40	2.29
Lewisham	116,550	133,450	146,771	30,222	1,511	2.36	2.25
Southwark	120,650	137,864	150,239	29,588	1,479	2.35	2.24
Bexley	92,905	102,226	110,771	17,865	893	2.50	2.37
Bromley	131,353	143,688	155,166	23,813	1,191	2.35	2.28
Greenwich	101,435	116,461	129,234	27,798	1,390	2.47	2.32

Source: GLA 2013 Round Trend Central Household Projection

Table 6.2 provides a summary of the overall requirements, after adjusting for second homes and vacancies:

Table 6.2 Overall housing requirements by borough and demographic scenario

		Bexley	Bromley	Greenwich	Lewisham	Southwark	SE London
Net household growth 2011-2031	Low	15,501	20,521	25,013	26,947	26,172	114,154
	<i>Central</i>	17,865	23,813	27,798	30,222	29,588	129,286
	High	20,276	27,167	30,637	33,559	33,073	144,712
Concealed		1,643	1,614	2,597	2,146	2,331	10,330
Homeless		180	418	139	515	325	1,577
Net additional households requiring housing 2011-2031	Low	17,324	22,553	27,749	29,608	28,828	126,061
	<i>Central</i>	19,688	25,845	30,534	32,883	32,244	141,193
	High	22,099	29,199	33,373	36,220	35,729	156,619
Vacancy rate		1.33	1.95	1.96	1.57	2.12	1.81
Net additional dwelling requirement allowing for vacancies 2011-2031	Low	17,554	22,993	28,293	30,072	29,439	128,351
	<i>Central</i>	19,950	26,349	31,133	33,399	32,927	143,758
	High	22,393	29,768	34,027	36,788	36,486	159,463
Net additional dwelling requirement per annum allowing for vacancies	Low	878	1,150	1,415	1,504	1,472	6,418
	<i>Central</i>	997	1,317	1,557	1,670	1,646	7,188
	High	1,120	1,488	1,701	1,839	1,824	7,973

Sources: GLA 2013 Round Household Projections, DCLG Interim 2011-based Household Projections.

This results in an OAN figure of 1,317dpa for Bromley.

For comparison, it is useful to note the emerging London Plan proposes a target for Bromley of 1,424dpa.

We note that the government's standard assessment indicates a need for 2,564dpa (*Planning for the Right Homes in the Right Places* consultation, DCLG, September 2017).

The net need for affordable housing is 1,404dpa (see Table 6.10 of the South East London SHMA).

If London is to be regarded as a single HMA, then to ensure that the OAN is being met, would require all the plans to collectively provide for more homes than their benchmark targets. London is failing to meet the London Plan benchmark targets, despite the assertion of the Mayor that collectively London will plan for at least 49,000 homes. The table below shows that of the London borough local plans published and adopted to date, few have provided for more homes than the London Plan benchmarks. Indeed, there is a slight under-supply against these benchmarks - 504dpa below the benchmark minimum required.

	Local Plan	London Plan	Increase/shortfall
Bromley	641	641	0
Camden	1120	889	231
Croydon	1644	1435	209
Enfield	798	798	0
Hackney	1599	1599	0
Ham & Fulh	1100	1031	69
Haringey	1502	1502	0
Havering	1170	1170	0
Hounslow	822	822	0
Lambeth	1195	1559	-364
Redbridge	1149	1123	23
Rich' Upon			
Thames	315	315	0
RBKC	733	733	0
Southwark	2000	2736	-736
Sutton	427	363	64
Tower Hamlets	3931	3931	0
Wandsworth	1812	1812	0
Westminster	1068	1068	0
	23026	23527	-504

17) What is the justification for the windfall allowance contained in the plan, given the London Strategic Housing Land Availability Assessment states that dependence on windfall capacity should be minimised?

The windfall allowance is a very large one – much larger than is commonly seen either in London or elsewhere. The HBF considers that it is sensible to make an allowance for windfalls, but this allowance is too big. According to paragraph 2.7 of the Local Plan the small site windfall figure equates to 3,520 homes over 10 years, which would be 55% of the overall requirement. The figure of 3,520 represents over half the 6,410 homes required over the ten year plan period (641 x 10). Percentages of 10-20% are more common elsewhere. While we acknowledge that the GLA's SHLAA 2013 might have assessed that historically (for the period 2004-2012) an average of 352dpa have materialised each year in Bromley, the Council should not rely on this to such a large extent as a component of its housing land supply. This is because windfall can never be guaranteed. The Council needs more by way of a contingency to both: a) ensure that delivery of at least 641dpa can be sustained; and b) to try and provide more than just 641dpa.

We would be less concerned if more of the small sites component was made up of actual identified and allocated sites. The government is concerned about the decline in the number of smaller housebuilders as articulated in its *Housing White Paper* of February this year. To help reverse this decline the government is proposing to increase the number of small site allocations in local plans – equivalent to 10% of all allocations – to help support the growth of smaller developers. The HBF, in its response to government, has argued that a more effective measure would be to ensure that *10% of the overall housing requirement* should be provided on small sites, because 10% of overall allocations may not amount to that many dwellings in total (for example, you could have 10% of the housing allocations in a plan made up of sites that are able to accommodate three units each). Given this signal from government about the need to allocate more small sites, we consider that more work is needed from the Council to identify specific sites, rather than relying on a more notional rate of delivery based on past trends.

The Council should make more specific allocations so that the small sites windfall allowance constitutes only about 20% of the overall requirement.

We note paragraph 3.86 of the GLA SHLAA 2013. This states that:

“despite identifying significantly more housing potential in the 2013 study, Bromley, Hillingdon, Merton, Richmond and Sutton’s capacity targets remain below their average delivery. There is some anecdotal evidence which might suggest that this higher than target delivery could paradoxically be a consequence of boroughs not allocating sufficient housing sites and thus losing planning appeals for development on unallocated sites.”

The assessment by the GLA indicates that Bromley has the capacity to provide for more housing than its minimum benchmark target. Past delivery rates would reinforce this view.

Long term vacant homes returning to use

We note in the Council's *Five Year Housing Land Supply* statement of November 2016 that it assumes that 100 units per year over the next five years will materialise in the form of vacant homes returning to use. We note that the Council quotes DCLG Live Table 615 which shows that the average per year for 2004-2014 has been 90 homes. While it is sensible to encourage homes back into use, we consider it unwise that the Council relies on this component to such a large extent as part of its five year land supply calculation. 500 homes from this source represents about 15% of the overall five year need.

Changes of use from office to residential

The Council assumes 200 dwellings from this source in the first five years. We consider that there is risk of an element of double-counting here with the small sites windfall allowance.

18) Will the Plan provide a 5-year housing land supply of deliverable sites with an appropriate buffer in accordance with paragraph 47 of the National Planning Policy Framework (NPPF)? How would any shortfall in delivery be addressed and how

would a continuing supply be achieved over the Plan period, having regard to any review of the London Plan?

We are concerned that just 2,304 units out of a total five year need of 3,205 are on specific, identified sites. The Council relies too much on notional sources of supply, as discussed above.

We also note that the Council's Five Year Housing Land Supply statement of November 2016, includes a number of sites with quite old planning permissions – some dating back to 2010 – that have not yet been built out in full (we assume the 'S' in the status column refers to 'started').

In terms of whether it is appropriate to apply a 5 or 20% buffer the Council does not provide evidence of past rates of delivery to enable one to determine this issue. The Council's latest AMR for 2014-2016 does not provide an account of numbers of net completions in recent years. Nor did the earlier AMR of 2013-2014 (as we referred to in our representations). The Council needs to furnish the examination with details of its net completions to enable third parties to judge whether it is a five or 20% borough.

However, according to DCLG Live Table 211 which record net additions by local authority, the figures for Bromley are:

Year	Completions	London Plan target
2006/07	750	485
2007/08	950	485
2008/09	770	485
2009/10	560	485
2010/11	740	485
2011/12	580	500
2012/13	690	500
2013/14	150	500
2014/15	410	500
2015/16	700	641

These figures suggest that in the main the Council has delivered well against whichever London Plan target was in place at the time. These figures also indicate that Bromley has more untapped potential for residential land than it is prepared to identify – something that reinforces the GLA's view referred to above and the new, higher, housing target in the merging London Plan.

For this reason we consider that the Council should apply a non-implementation allowance of 10% to its five year land supply calculations and identify more specific sites of various sizes and in more varied locations to reduce its dependency on windfall. More allocations will have a number of benefits: it will provide more certainty for the house building industry (including RSLs and local authority housing companies); it will help to reinforce the Council's confidence in its plan so it can resist more easily the threat of 'planning by appeal'; and more allocations of various

sizes will also help support the government's aim for more diversification within the housebuilding industry.

19) Given the matrix in Table 3.2 of the London Plan, has the Council made reasonable assumptions about the housing densities that can be reasonably be achieved on development sites, especially when Outer London Boroughs are encouraged to increase densities? 2 ID/2

We consider that the Council should reconsider its approach to housing density – both in town centres and suburbia. This is necessary to help deliver more homes. We understand that the emerging London Plan will seek to relax density policy further to facilitate higher levels of housing delivery in the outer boroughs. This is why Bromley has a higher housing requirement in the emerging London Plan.

20) Are the sites identified for housing supply deliverable and developable in accordance with paragraph 47 of the NPPF?

We query the age of some of the planning permissions and the time some appear to take to build out. There are some sites listed in the five year land supply that received planning permission over five years ago.

We consider it would be wise to add a non-implementation allowance of 10% as a cautionary measure in case these and other sites fail to be built out in time.

21) Is there sufficient flexibility within the allocations to accommodate unexpected delays whilst maintaining an adequate supply?

The Council is faced by two risks to its plan: the very heavy dependency on windfall and the inclusion of a number of sites with quite dated planning permissions that have yet to be completed.

We consider it would be wise to add a non-implementation allowance of 10% as a cautionary measure in case these and other sites fail to be built out in time.

22) How would the supply of housing sites be monitored and managed? Explain the implementation strategy for the delivery of housing.

The Local Plan is too inflexible because it relies too much on windfall. If the Council finds at some point that it is unable to maintain a five year land supply (because some of the allocations fail to come forward in time or the windfall does not materialise in the number expected) then it will struggle to draw upon alternative site options. The Council needs to identify more sites of various sizes in wider locations to generate a reservoir of alternative options.

It is difficult to see how this problem could be rectified once the Plan is adopted. We suggest that if the Council is unable to demonstrate a five year supply then this should immediately trigger a review of the Plan. This may be necessary in any case to revise the Local Plan in line with the new London Plan.

23) What is the rationale for the affordable housing target being 35%. How does this respond to the identified need for affordable housing, the Viability Assessment, the London Plan and the aspirations of the Mayor of London?

The Council has taken the political decision to plan for the bare minimum number of homes. Clearly this will not resolve the current serious problems of affordability in the district. The Council has a large OAN of 1,317dpa and an affordable housing of 1,404 net additions each year. Producing a plan that will only provide 641dpa will clearly only aggravate further the problems of housing affordability. Balanced against this is the problem of viability – land owners with the benefit of an allocation for residential development through the local plan know they own a scarce and valuable commodity. The Council has undertaken a viability assessment. This shows that it will be difficult to secure more than between 35-40% affordable housing while ensuring “competitive returns to a willing land owner and willing developer to enable the development to be deliverable” (NPPF, 173).

24) Has the Council considered increasing the total housing figures in order to help deliver the number of affordable homes required, in accordance with the PPG? What would be the implications of any such increase?

This is for the Council to answer.

25) Does the Plan adequately address the needs for all types of housing and the needs of different groups in the community as set out in paragraph 159 of the NPPF? Should policy 1 make specific reference to student accommodation?

Older people

It is understood by the government that the needs of older people are being neglected by the planning system. A recent report by Demos for the HBF (November 2017) identifies that the housing crisis affects not only the young, but older people too. It is estimated by the report that England needs 30,000 older people’s homes a year. In its *Housing White Paper* the government announced that it would introduce guidance for local planning authorities on how their development plan documents should meet the needs of older and disabled people. The guidance will place clearer expectations on planning to meet the needs of older people. In the meantime, this version of the Tower Hamlets Local Plan could do more to support the building of homes for older people, including extra care homes, assisted living homes, and retirement homes.

The London Plan establishes indicative strategic benchmarks in Table A5.1. This indicates that Bromley needs to provide 205 specialist homes for older people each year, and it breaks this down between private sale, intermediate sale and affordable rent. The Bromley Local Plan should refer to this indicative benchmark, and we recommend that the policy is re-drafted so that the local authority will consider schemes for older peoples’ housing favourably, especially if the Council has failed to achieve its indicative benchmark in any one of the past five years. We suggest:

“The Council will operate a presumption in favour of schemes for older peoples’ housing where the Council has failed to match its indicative benchmark of 205dpa in any one of the previous three years.”

The Council should draft a monitor its performance against this target, and include this as a performance indicator in the Local Plan. If it fails to achieve the target in any of the first three years, this should trigger a review of the Local Plan.

Students

We consider that the Council should distinguish between the supply of C3 use and C2 use class homes. The HBF is not convinced that the construction of C2 use class homes, and counting each room as a unit of completion, will contribute to meeting the housing needs of the borough (see paragraph 2.26 of the *London Plan Annual Monitoring Report 2015/16*. This is a problematical area that the GLA has acknowledged (see paragraph 2.26 of the *London Plan Annual Monitoring Report 2015/16*). We note in the GLA’s most recent AMR that in 2015/16 that there was a net loss of C2 use class dwellings in Bromley (minus 68). See *London Plan Annual Monitoring Report 2015/16*, page 28.

This is a very dubious area but we recognise why it is politically expedient to count student rooms towards the housing target because it reduces the overall land supply requirement. Unfortunately, it will have serious repercussions. If student rooms continue to be counted as net additions to the housing stock, then this increases the risk that local authorities will under-provide against their conventional housing needs which are essentially measured by the household projections. This is why some university cities like Canterbury and Norwich do not count student rooms/dwellings towards their housing targets. The development of residential land earmarked for traditional housing needs is beginning to cause tensions in some cities, like Bath. This is because the student population is growing at a much faster rate than the population/household projections, and because the population/household projections are based on past trends they fail to take into account the expansion plans of the universities.

26) Is there suitable provision for Traveller accommodation having regard to the Planning Policy for Traveller Sites? Set out in detail the case for exceptional circumstances for creating insets within the Green Belt for Traveller sites.

No comment.

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