

Draft London Plan EiP 2019

London Borough of Bromley Written Statement

Matter 19

Housing supply and targets

Comment

Are the overall 10 year housing target for London and the target for the individual Boroughs and Corporations set out in Policy H1 A and Table 4.1 justified and deliverable? In particular:

a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the Strategic Housing and Employment Land Availability Assessment reasonable and realistic?

In line with the Final SHLAA methodology, the SHLAA software had various assumptions built into it for large sites and relevant data was inputted by borough officers for each site. During the final stage of the exercise some sites were discussed with GLA officers and amendments made where appropriate. In this context the borough officers and the GLA worked together on the assumptions and analysis of large sites.

The Council objects though to the phasing of some of the large sites for the Borough in the 2017 SHLAA (NLP/HOU/002) which is based on when sites may be entirely completed. This does not adequately reflect the phasing submitted to the GLA by officers and is misleading [in terms of when units are expected to be delivered on site] when compared with borough planning documents including the housing trajectory included in Appendix 10.1 of the Draft Local Plan.

Tables 1 and 2 of Appendix 1 to this statement illustrate how the phasing of sites inputted by officers differs to that set out in Appendix E of the GLA's 2017 SHLAA (Allocations, marked as F incorrectly). It would be beneficial for the SHLAA to include the general phasing of units across sites to give a more accurate account of expected delivery. At the very least there should be reference in the Draft London Plan to the fact that Appendix E of the SHLAA relates to the expected completion timescale of entire sites. This would ensure that the SHLAA is more consistent with borough level Local Plans.

LB Bromley suggested corrections to large sites (Appendix E)

Site 11 of the Draft Local Plan (Homefield Rise Orpington BR6) was omitted from the Borough's list of large sites in the 2017 SHLAA assessment in error. The site is 0.75ha in size and is allocated for approximately 87 units in the Draft Local Plan.

The phasing for the site is from 2015/16 – 2024/25. The stated position is that the site should be included in the 2017 SHLAA.

Site 13 of the Draft Local Plan (Banbury House Bushell Way, Chislehurst) was omitted from the Borough's list of large sites in the 2017 SHLAA assessment in error. The site is 0.27ha in size and is allocated for approximately 25 units in the Draft Local Plan. The phasing for the site is from 2015/16 – 2019/20. The stated position is that the site should be included in the 2017 SHLAA.

SHLAA reference 17060337 - Bromley Valley Gym (200 units). The phasing of the site in the Draft Local Plan falls in 2020-2025 (Years 6-10) whereas in the GLA 2017 SHLAA the site appears in 2024-2029 (Phase 3). The stated position is that the phasing in the 2017 SHLAA should be as shown in the Draft Local Plan.

SHLAA reference 17060375 - Site P Sainsburys West Street Bromley (20 units). The phasing of the site in the Draft Local Plan falls in 2020 – 2025 (Years 6-10) and in the GLA 2017 SHLAA it appears in 2024 – 2034 (Phases 3-4). The stated position is that the phasing in the 2017 SHLAA should be as shown in the Draft Local Plan.

b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?

The targets set out in Table 4.1 include an increase in the boroughs' small site target by 677 units per annum taking the small site target to 1029 units per annum. Small sites are more difficult to plan for in terms of their impact on social infrastructure and are also less likely to make a contribution to new social infrastructure. The cumulative effect of small site development not making a significant contribution to social infrastructure should not be underestimated.

The GLA's Integrated Impact Assessment (NLP/CD/04) makes observations in relation to the above on page 137 (under Draft Policy H1) stating that:

"In relation to increasing the density of development, additional detail could be provided on the supporting infrastructure required to underpin growth. This could include proximity to schools, health centres, public and active transport infrastructure and open space. The policy could also provide reference to high quality design and layout of development in order to mitigate potentially adverse impacts associated with high density, mixed-use development".

It is considered that the delivery of the increased small site targets will cumulatively impact upon the need for infrastructure provision. This may not be sought depending upon the number of units being provided on site.

With regard to environmental implications, Paragraph 53 of the 2012 NPPF (NLP/GD/03) states that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. The Draft London Plan policy and supporting text for small sites and small housing developments is not entirely consistent with paragraph 53 of the NPPF. The current NPPF reiterates the

guidance set out in 2012 in paragraph 70. Policy H2 does not make reference to the option that exists for boroughs to consider the case for setting out policies through the local plan process to resist inappropriate development of residential gardens. Instead, Policy H2 assumes a presumption in favour of small housing developments unless it can be demonstrated that the development would give rise to an unacceptable level of harm that outweighs the benefits of additional housing provision or does not comply with a design code.

In light of the above Policy H2 could have a significant environmental impact on existing residential areas. This would result from the assembly and redevelopment of sites that include residential gardens. The potential impact of Policy H2 on existing residential amenity is addressed in the Council's Statement for Matter 20 (Question b). To achieve the increase in small targets local compromises will have to be made in terms of increased harm to residential amenity, the lowering of design standards and the prevention of boroughs being able to establish their own local policies to protect garden land where appropriate.

e) Is the emphasis on development in outer London consistent with the intention in Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?

Paragraph 1.2.4 of the Draft London Plan sets out that making the best use of land means directing growth towards the most accessibly and well-connected places. Paragraph 1.2.5 states that suitable sites for new development include brownfield sites and the intensification of existing places, including outer London. It specifies that new and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring new developments are not planned around car use.

The speed with which the housing targets are planned to be implemented (from April 2019) would mean that "*new and enhanced transport links*" would not be in place. This highlights the need for a transition period for the implementation of revised housing targets.

With regard to small sites the GLA's methodology assumes 1% of the existing stock of houses will increase in density in areas which benefit from PTALs of 3 to 6 or area within 800m of a railway station or tube station or a town centre. This simplistic approach fails to recognise the variation in accessibility provided by Central London tube stations and outer suburban rail stations (for example Chelsfield station with 4 - 6 trains hourly of which 2 – 3 to London). This variation in accessibility significantly affects the delivery of the theoretical level of development proposed by the London Plan for boroughs with varying levels of accessibility.

f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?

See also b above in relation to environmental and social infrastructure impacts.

See also g below in relation to the viability of small site delivery.

See also Council's response to Matters 20, 22, 36, 39 and 89.

g) What is going to bring about the step change in delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement?

The Council objects to the timescale in the Draft London Plan which expects the commencement of delivery of new targets to occur from April 2019. In light of this it is recommended that a stepped or transitional arrangement should be incorporated for housing targets. It is acknowledged that the Plan proposes policy changes to help enable the delivery of the increased targets on small sites however, the viability and actual delivery of the increased targets on site is unclear and not supported by evidence across the boroughs. This also relates to the Council's objections to GLA's 2017 SHLAA Approach 3 for Small Sites set out in Matter 20 that makes reference to the time it will take to implement design codes and develop revised Local Plans to accommodate the increased level of growth proposed.

Paragraph 1.4.7 adheres to the "*huge challenge*" of delivering the housing London needs requiring everyone involved in the housing market to work together and the inter-relationship of the Draft London Plan and the London Housing Strategy. This highlights that it is not just tools at the disposal of boroughs that are required but those available across the entire housing sector to enable delivery on such a scale to occur.

Of importance is how the GLA propose to support boroughs in the meantime to include large windfall allowances in five year housing land supply positions given the unpredictability of delivery on such a large scale for small sites. Advice on how boroughs can justify doing this (in light of previous small site delivery levels) and the sound evidence behind the methodology needs to be provided for inclusion in 5YHLS positions.

l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

The Council's response to Matter 20(g) relates to the above question. Relevant implications from this response are set out below and largely relate to the increased small site target for the Borough.

Table 4.2 of the Draft London Plan sets out 10 year targets (2019/20 – 2028/29) for net housing completions on small sites (below 0.25 hectares in size). This is consistent with the timescale for implementation of the 10 year targets for net housing completions overall set out in Table 4.1. There is significant concern in relation to the speed at which the overall increased targets (and small site targets) will be implemented with monitoring commencing in April 2019. In April 2019 the Examination in Public will still be taking place yet monitoring will have started on a policy that is still draft in status.

The general policy change, including the preparation of design codes and site briefs as set out in Clauses A – C will take some time to establish, until such time there will

be an impact upon the actual delivery of forthcoming small site planning permissions and completions. A transition period should be proposed for the implementation of the targets (albeit the targets are considered to be too high), in a similar way to the transition period for the housing delivery test in the 2018 NPPF. This is actually acknowledged in paragraph 4.1.3 (Policy H1 Increasing Housing Supply) of the Draft London Plan that states:

Paragraph 4.3.1 “To achieve these housing targets the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how homes are delivered. The London Plan, London Housing Strategy and Mayor’s Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure ..”

It is also adhered to in paragraph 4.3.1 of the Plan that states the annual averages in Table 4.1 provide a benchmark for assessing the direction of travel towards ten-year housing targets both across London and by borough. It acknowledges that there will inevitably be variations in completions from one year to the next as well as a degree of uncertainty in the delivery and phasing of large sites. This contrasts with the minor change proposed at Policy H2 A 4A) that states Boroughs should achieve the targets for small sites set out in Table 4.2. The minor change set out in Clause A, 4A is also not consistent with Clause B of Policy H3 that states “*Net housing delivery on sites of less than 0.25 ha should contribute towards achieving the small sites targets in Table 4.2*” as opposed to achieving the target.

The Council’s response to Matter 20 (b) highlights some of the residential amenity issues that have been deliberated at appeals [on small sites proposed for residential purpose] in the past year and resulted in cases being dismissed. There is concern that to achieve the increase in small targets if they are adopted local compromises will have to be made on such sites in terms of increased harm to residential amenity, the lowering of design standards and the prevention of boroughs being able to establish their own local policies to protect garden land.

In light of the speed of target implementation (albeit that paragraph 4.3.1 makes reference to a ‘direction of travel’) there will be an increase in Section 78 planning appeals if targets are not met, including non-determination appeals. This could make protected open space sites vulnerable to future housing development, including Green Belt, Metropolitan Open Land and Urban Open Space sites. It is these categories of sites that were excluded from the London-wide SHLAAs for being unsustainable.

Paragraph 4.1.8 makes reference to the fact that boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the small site targets. In light of the above objections relating to speed of implementation and lack of evidence to justify the small site target increase there is significant concern over whether such a windfall allowance could be justified or deliverable. If boroughs are supported in including their small site targets in their five year trajectories it is

proposed that the GLA would need to support them in Section 78 situations where a public inquiry examines housing land supply issues.

Appendix 1 M19 – LB Bromley (2593) Written Statement

APPENDIX 1

Table 1 Phasing of sites as assessed by the Council for the 2017 SHLAA (based on unit delivery)

Site name	Phasing of sites as assessed by the Council for GLA 2017 SHLAA (summer 2017)					Total number of units
	Phase 1 April 17 - March 19	Phase 2 April 19 - March 24	Phase 3 April 24 - March 29	Phase 4 April 29 - March 34	Phase 5 April 34 - March 41	
Draft Local Plan Site Allocations						
1. Bromley Civic Centre		34 units	34 units			68
2. Land adj. Bromley North		446 units	79 units			525
3. Hill Car Park		149 units				149
4. Gas holder site Homesdale Road		12 units	48 units			60
5. Land adj. Bickley Station		27 units	3 units			30
6. Bromley Valley Gym			200 units			200
7. Orchard Lodge		252 units				252
8. Bassetts Campus		85 units	21 units			106
9. Former Depot	28 units					28
10. West of Bromley High Street		246 units	983 units			1229
11. Homefield Rise	not included in error					
12. Small Halls York Rise		35 units				35
13. Banbury House	not included possibly due to site size close to 0.25 ha threshold					
Bromley Town Centre Area Action Plan sites						
Site P Sainsburys West Street			9	9		18
Site B Tweedy Road/London Road		24				24
Total						2724

**Table 2 Phasing of sites in the published GLA SHLAA 2017 (based on whole scheme completion)
Appendix E Allocations**

Site name	Phase 1 April 17 - March 19	Phase 2 April 19 - March 24	Phase 3 April 24 - March 29	Phase 4 April 29 - March 34	Phase 5 April 34 - March 41
Draft Local Plan Site Allocations					
1. Bromley Civic Centre			all units		
2. Land adj. Bromley North			all units		
3. Hill Car Park		all units			
4. Gas Holder site Homesdale Road			all units		
5. Land adj. Bickley Station			all units		
6. Bromley Valley Gym			all units		
7. Orchard Lodge		all units			
8. Bassetts Campus		all units			
9. Former Depot	all units				
10. West of Bromley High Street			all units		
11. Homefield Rise	not included in error				
12. Small Halls York Rise		all units			
13. Banbury House	not included possibly due to site size close to 0.25 ha threshold				
Bromley Town Centre Area Action Plan sites					
Site P Sainsburys West Street				all units	
Site B Tweedy Road/London Road		all units			

