

5 YEAR SUPPLY OF DELIVERABLE HOUSING SITES 2020/2021 - 2024/2025 July 2021

EXECUTIVE SUMMARY

- The new ten year target for net housing completions in the London Borough of Hillingdon is 10,830 between 2019/20 and 2028/2029. The gives an annual average monitoring target of 1,083 completions per annum.
- Including a 5% buffer and deducting the 1,707 dwellings already delivered during the first year of the monitoring period (2019/20), the five year housing provision target for Hillingdon from 2020/21 2024/25 is **5,322** dwellings (rounded). This equates to an annual average of **1,064** new dwellings (rounded).
- The Council is able to identify a supply of specific deliverable sites that have the capacity to deliver **6,701** net additional dwellings over the next five years.
- This represents **126**% of the minimum five year supply target with a 5% buffer (**5,321.75** dwellings) or a surplus of **1,379** residential dwellings against the target.
- Hillingdon can therefore demonstrate a **6.3** year supply of deliverable housing sites (rounded), meeting the requirements for a five year supply in Paragraph 73 of the National Planning Policy Framework (2019).

1 INTRODUCTION

1.1 Purpose

This document identifies the supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing (and appropriate buffer) against the housing requirement set out in the London Borough of Hillingdon's Development Plan. The document establishes that there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next five years.

1.2 The five year period

The five year supply period is measured from the end of the financial year for which there are published housing completion figures. The last set of completion figures are between the 1st April 2019 to 31st March 2020. Therefore, this report assesses housing land supply for the five year period, starting 1st April 2020 to 31st March 2025.

The document was prepared in December 2020, with information taken from this period unless stated otherwise. Publication was delayed until July 2021, to allow the Greater London Authority to revisit the aforementioned Housing Flows Reconciliation (HFR) submitted to the Ministry of Housing, Communities and Local Government on behalf of the London Borough of Hillingdon and to provide one set of figures against the new housing targets, following the publication of the new London Plan in March 2021.

1.3 What counts as a completion?

For the purposes of calculating five year land supply, housing completions include new build dwellings, conversions, changes of use and demolitions and redevelopments. Completions are net figures, so will offset any demolitions.

1.4 Policy Context

Paragraph 73 of The National Planning Policy Framework (NPPF) (2019) sets out the requirement for local planning authorities to identify and update annually a supply of specific deliverable sites to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The London Plan (2021) is part of the Development Plan for the London Borough of Hillingdon and its strategic policies are less than five years' old. Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for.

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

In addition, the NPPF outlines the supply of specific deliverable sites should include a buffer of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

The London Borough of Hillingdon has a record of persistently meeting and exceeding its housing target, as demonstrated in Table 1. Therefore, there has been no significant under delivery of housing and there is no requirement for a 20% buffer.

The London Borough of Hillingdon has not notified the Planning Inspectorate of an intention to submit an annual position statement and thus the 10% is also not applicable. The London Borough of Hillingdon is satisfied that it would be able to demonstrate a 5-year land supply if required as part of an application or appeal.

Table 1 - Past 5-year Housing Delivery Performance

	Conventional	Non- Conventional	Long Term Vacant Units Back in Use	Total	Target	Difference
FY19	1626	81	N/A	1,707	1,083	+624
FY18	990	119	-73	1,036	559	+477
FY17	913	114	-89	938	559	+379
FY16	898	27	62	987	559	+428
FY15	876	71	6	953	559	+394

Source: Planning Datahub. Information Extracted 16th July 2021.

1.5 Data sources

The housing supply targets for Hillingdon are derived from the targets in the previous London Plan (2016) and new London Plan (2021) respectively. The number of long-term vacant properties returning to use is calculated using the government's Housing Live Table 615, by taking the net change in the number of long-term empty properties (longer than six months). It should be noted that the SHLAA (2017) elected to omit projecting capacity from long-term vacant properties returning to use, with the new London Plan (2021) confirming that that self-contained and non-self-contained properties only should count towards the housing targets, in line with the Government's Housing Delivery Test Measurement Rulebook.

The number of applications submitted, started and completed is taken from the Planning Datahub (formerly the LDD). This is a live system monitoring planning permissions and completions. It provides good quality, comprehensive data for the GLA, London boroughs and others in involved in planning for London. The data within it is comprised of a wide range of sources including:

- Building Control records
- VOA Council Tax Valuation List
- Molior Database
- Ordnance Survey Records
- Site Surveys from Planning Officers
- Information provided by applicants

2 HOUSING PROVISION TO BE DELIVERED

2.1 The Development Plan context

Paragraph 73 of the NPPF (2019) is specific in outlining that local planning authorities should identify a supply of specific deliverable sites against the housing requirement set out in adopted strategic policies. The London Plan (2021) sets housing targets for all London Boroughs. It sets the housing target for the London Borough of Hillingdon at 1,083 units per annum or 10,830 units between 2019/20 - 2028/29. This is the current adopted strategic housing target for the London Borough of Hillingdon and was adopted in the last five years. It is therefore the housing requirement for the purposes of calculating the five year housing land supply.

The London Plan (2021) also includes a new trajectory for the anticipated number of units on unidentified small sites (<0.25ha). This is set at 295 homers per annum or 2,950 units between 2019/20 - 2028/29.

2.2 The five year supply target

The calculation of the five year land supply target is set out in Table 2 below.

Table 2: Hillingdon's Housing Provision Target

	Hillingdon's Housing Provision Target	Calculation	Units
А	Minimum Ten Year Target (London Plan 2021)	n/a	10,830
В	Annual average requirement	n/a	1,083
С	Housing Delivery Performance (2019/20)	n/a	1,707 ¹
D	Remaining housing required between (2020/21 - 2028/29)	A - C	9,123
E	Number of remaining plan years (2020/21 - 2028/29)	n/a	9
F	Annual minimum target for new homes required in the remaining period	D/E	1,013.67
G	Five year target (01/04/2020 - 31/03/2025)	F x 5	5,068.33
Н	5% buffer	5 % of G	253.42
ı	Five-year target plus 5% buffer	G + H	5,322 ²

¹ Please see Table 1.

² Rounded from 5321.750

3 DEVELOPMENT SITES WITH THE POTENTIAL TO DELIVER HOUSING

3.1 Components of Supply

The five year minimum target will be met through the delivery of residential dwellings from different types of identified development sites.

Table 4: Housing delivery from different types of identified development sites

Item	Site Typologies	Total Number of Net Additional Homes from Identified Housing Sites	Number of Units Anticipated to Be Delivered in 5 Years
i	Sites Under Construction	3,800	3,134
ii	Sites with Unimplemented Detailed Planning Permission	1,265	1,265
iii	Sites with Approval Subject to S106 Agreement	827	827
iv	Site Allocations	2,033 ³	0
V	Windfall Sites (<0.25ha)	2,950	1,475
TOTAL		10,875	6,701

i) Sites Under Construction

There are a total of 3,800 net additional dwellings on approved schemes that are under construction from sites greater than or equal 0.25ha. Of this figure, 3,134 net additional dwellings are expected to be built in the next five years. The 666 approved net additional dwellings that are not anticipated to be built within the next five years are on the Former Nestle Factory Site (1331/APP/2019/2314) and RAF Uxbridge Site (585/APP/2009/2752). These have been excluded from the 5-year trajectory due to the scale of the site and their confirmed delivery phasing. Please see Appendix 3 for a full list of sites under construction.

ii) Sites with Unimplemented Detailed Planning Permission

In accordance with Annex 2 of the NPPF, all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will

³ Figure based on indicative capacities with schemes identified as 'to be determined by design' treated as 0.

not be delivered within five years. Accordingly, all sites greater or equal to 0.25ha with unimplemented planning permissions have been reviewed and amount to a total of 1,265 net additional dwellings. All these net additional dwellings are anticipated to be delivered within the next five years. Please see Appendix 4 for a full list of sites with unimplemented detailed planning permission.

iii) Sites with Approval Subject to S106 Agreement

There are three applications that have been approved subject to the signing of a Section 106 agreement. Once agreed, the sites will have detailed planning permission and would be considered deliverable. Noting their current planning status and the likelihood of the agreements being signed shortly after the publication of this document, all four sites have been included within the trajectory. Confirmation has also been provided from the site representatives that their delivery is anticipated within the five year trajectory. The sites have a total capacity of 666 units. Please see Appendix 5 for a full list of sites with approval subject to \$106 agreement.

iv) Site Allocations

The Local Plan: Part 2 – Site Allocations and Designations documents was adopted on 16 January 2020. A number of these site allocations already have planning consents and are therefore included within i), ii) and iii). The remaining sites have the capacity to deliver a total of at least 2,033 net additional units, based on their indicative capacities in the site allocations document. Three of the allocations have not been assigned an indicative capacity but will contain residential units that increase this capacity further.

However, noting that the NPPF (2019) outlines that sites allocated in a development plan should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years, these sites have not been included within the five year trajectory. Please see Appendix 7 for a full list of these sites.

v) Windfall Sites

Paragraph 70 of the NPPF (2019) outlines that where an allowance is to be made for windfall sites as part of the anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates and expected future trends.

The London SHLAA (2017) underpins the current adopted strategic housing target. Following revisions as part of the examination in public, a new projected figure was provided and accepted based on windfall delivery and expected future trends. Table 4.2 of the London Plan (2021) identifies an average of 295 units per annum have been delivered in Hillingdon from sites under 0.25ha. Paragraph 4.2.3 of this plan outlines that the small sites targets can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect require by Paragraph 70 of the NPPF (2019).

vii) Non-self-contained Accommodation

The NPPG is clear that local authorities should also take in account student housing and housing provided for older people as part of their housing land supply. The contribution should be based on the amount of accommodation released in the housing market. At present, there is not any non-self-contained accommodation specifically for students identified within the trajectory. However, there is non-self-contained accommodation for older people included as part of the housing land supply. These are incorporated within the relevant section above and appendices, however for clarity they are:

- 72 Units approved within RAF Uxbridge, Uxbridge North
- 50 Units approved within Trout Road Site A (Kirby and Rainbow Industrial Estates),
 Yiewsley

Paragraph 4.1.9 of the London Plan (2021) outlines that a consistent approach should be applied across London and that net non-self-contained accommodation for older people (C2 use class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home.

ix) Empty Homes

The NPPG also suggests that local authorities could include bringing empty homes back into use where they can ensure that these have not already been counted as part of the existing stock of dwellings. However, the London Borough of Hillingdon does not have specific evidence to provide a consistent trend for this source of supply. It should also be noted that the SHLAA (2017) elected to omit projecting capacity from long-term vacant properties returning to use, with the new London Plan confirming that that self-contained and non-self-contained properties only should count towards the housing targets, in line with the Government's Housing Delivery Test Measurement Rulebook. The return of long-term vacant properties therefore do not form part of the housing supply trajectory.

3.2 Specific deliverable sites

Appendix 1 sets out the trajectory for the supply of specific deliverable sites that have been identified as providing a minimum of five years' worth of housing against the adopted housing requirement.

4 CONCLUSIONS

This five year Supply of Deliverable Housing Sites assessment identifies a supply of specific deliverable sites in Hillingdon that have the capacity to deliver 6,701 residential dwellings within five years. This represents 126% of the minimum five year supply target (5,321.75 dwellings) or a surplus of 1,379 residential dwellings against the minimum target. Accordingly, the London Borough of Hillingdon has a land supply of 6.3 years (rounded).

5 MONITORING

Looking forward, the Council's next Report will be prepared by 31st December 2021 and will set out the five year land supply for the period 1st April 2021 to 31st March 2026.

6 APPENDICES

Appendix 1: Trajectory 1 – Supply of specific deliverable site

		2020/21	2021/22	2022/23	2023/24	2024/25
	Unidentified Windfall Sites (<0.25 ha)	295	295	295	295	295
Stra	tegic Sites (<u>></u> 0.25 ha)					
1	Former Allotments and Melrose Close Car Park, Barnhill				112	
2	Enterprise House, Botwell				96	
3	The Old Vinyl Factory, Botwell		81	181	134	
4	Eastern End of Blyth Road Site B, Botwell	65	53			
5	Land to South of the Railway, including Nestle Site A, Botwell	188	291	194		532
6	Land at 3, 233-236, Nestles Avenue, Botwell					457
7	Fairview Business Centre Sites A & B, Botwell					400
8	Crown Trading Estate, Botwell				204	203
9	Harefield Grove, Harefield	2	3	19		
10	Bedfont Cross Stanwell Road, Heathrow Villages			44		
11	Former Garage Site Rear of 6-16 Nelson Road, Hillingdon East		6			
12	Land to East of London School of Theology, Northwood			15		
13	Building 3, Hyde Park Hayes, Pinkwell			157		
14	Bourne Court, South Ruislip			96		
15	401 Uxbridge Road, Hayes, Townfield			20		
16	Silverdale Road/Western View Site A, Townfield			42	80	_
17	Chailey Industrial Estate Site A, Townfield		72	98	84	77
18	RAF Uxbridge, Uxbridge North	68	19	72		_

19	Randalls Building, Uxbridge South		58			
20	Bridge House, Riverview House & Waterside House, Uxbridge South		141	116		
21	Weir House, Uxbridge South			20		
22	Allport House, Uxbridge South		37			
23	Woodbridge House, Uxbridge South		10			
24	Otter House, Uxbridge South			31		
25	Maple And Poplar Day Centre, Yeading		34			
26	Padcroft Works Site A, Yiewsley	130				
27	Padcroft Works Site B, Yiewsley			50	54	
28	Trout Road Site A (Kirby and Rainbow Industrial Estates), Yiewsley				149	
29	Land to Rear of Horton Road, Yiewsley	87				
30	Morrisons Supermarket 41-67 High Street, Yiewsley			144		
Tota	l Projected Completions	835	1100	1594	1208	1964

Appendix 3: Sites Considered Deliverable: Detailed Planning Permission - Started

	Site	Main Application Reference	Capacity
2	Enterprise House, Botwell	11623/APP/2013/3606	96
3	The Old Vinyl Factory, Botwell	59872/APP/2012/1838	396
4	Eastern End of Blyth Road Site B, Botwell	68974/APP/2018/2146	118
5	Land to South of the Railway, including Nestle Site A, Botwell	1331/APP/2017/1883	1473
9	Harefield Grove, Harefield	28301/APP/2013/3104	24
11	Former Garage Site Rear of 6-16 Nelson Road, Hillingdon East	72704/APP/2017/1068	6
14	Bourne Court, South Ruislip	11891/APP/2020/20	96
15	401 Uxbridge Road, Hayes, Townfield	23799/APP/2017/4648	20
17	Chailey Industrial Estate Site A, Townfield	2102/APP/2018/4231	331
18	RAF Uxbridge, Uxbridge North	585/APP/2009/2752	557
19	Randalls Building, Uxbridge South	41309/APP/2019/1265	58
20	Bridge House, Riverview House & Waterside House, Uxbridge South	40050/APP/2018/1737 40050/APP/2020/1009 40050/APP/2020/999	257
22	Allport House, Uxbridge South	46104/APP/2019/2606	37
23	Woodbridge House, Uxbridge South	20590/APP/2017/3413	10
26	Padcroft Works Site A, Yiewsley	45200/APP/2017/327	130
27	Padcroft Works Site B, Yiewsley	24843/APP/2018/269	104
29	Land to Rear of Horton Road, Yiewsley	71582/APP/2016/4582	87

Appendix 4: Sites Considered Deliverable: Detailed Planning Permission - Not Started

	Site	Main Application Reference	Capacity
1	Former Allotments and Melrose Close Car Park, Barnhill	68069/APP/2019/22	112
6	Land at 3, 233-236, Nestles Avenue, Botwell	73238/APP/2018/1145	457
10	Bedfont Cross Stanwell Road, Heathrow Villages	50395/APP/2019/1943	44
12	Land to East of London School of Theology, Northwood	10112/APP/2019/1244	15
13	Building 3, Hyde Park Hayes, Pinkwell	67702/APP/2018/920	157
16	Silverdale Road/Western View Site A, Townfield	71374/APP/2016/4027	122
24	Otter House, Uxbridge South	63329/APP/2020/1811	31
25	Maple And Poplar Day Centre, Yeading	43762/APP/2018/396	34

28	Trout Road Site A (Kirby and Rainbow Industrial	38058/APP/2017/1340	149
	Estates), Yiewsley		
30	Morrisons Supermarket 41-67 High Street, Yiewsley	2370/APP/2018/2793	144

Appendix 5: Sites Considered Deliverable: Detailed Planning Permission Subject to S106

	Site	Main Application Reference	Capacity
7	Fairview Business Centre Sites A & B, Botwell	58758/APP/2019/3517	400
8	Crown Trading Estate, Botwell	73955/APP/2020/139	407
21	Weir House, Uxbridge South	43495/APP/2020/888	20

Appendix 6: Excluded outline permissions and phased applications not deliverable within five years.

	Site	Main Application Reference	Approved Capacity Outside 5 Years
5	Land to South of the Railway, including Nestle Site A, Botwell	1331/APP/2017/1883	268
19	RAF Uxbridge, Uxbridge North – Phase 5	585/APP/2009/2752	121
19	RAF Uxbridge, Uxbridge North – Town Centre Extension West	585/APP/2009/2752	277

Appendix 7: Excluded site allocations that are not considered to be deliverable within five years.

	Site	Indicative Capacity
31	Land to South of the Railway, including Nestle Site B, Botwell	300
32	Remaining Land to South of the Railway, including Nestle Site C, Botwell	43
33	Charles Wilson Engineers, Charville	34
34	Royal Mail Sorting Office, Manor	22
35	Master Brewer and Hillingdon Circus Site B, Hillingdon East	250
36	Northwood Station, Northwood	To be determined by design
37	West End Road, South Ruislip (30 Units)	30
38	Chailey Industrial Estate Site B, Townfield	To be determined by design
39	Silverdale Road/Western View Site B, Townfield (119 Units)	119
40	Silverdale Road/Western View Site C, Townfield (122 Units)	122
41	Benlow Works, Townfield (36 Units)	36
42	High Street/Bakers Road Uxbridge	To be determined by design
43	St Andrew's Park (Annington Homes Site), Uxbridge North (330 Units)	330

44	Master Brewer and Hillingdon Circus Site A, Uxbridge North	140
45	Cape Boards, Uxbridge South (315 Units)	315
46	Former Vehicle Testing Station, Yeading (84 Units)	84
47	Hayes Bridge, Yeading (40 Units)	40
48	Former Coal Depot, Yiewsley (168 Units)	168