

5 YEAR SUPPLY OF DELIVERABLE HOUSING SITES

2021/2022 - 2025/2026

March 2022

EXECUTIVE SUMMARY

- The 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 2,432 dwellings already delivered during the first two years of the monitoring period (2019/20 2020/21), the five year housing provision target for Hillingdon from 2021/22 2025/26 is 5,249 dwellings (rounded). This equates to an annual average of 1,050 new dwellings (rounded).
- The Council is able to identify a supply of specific deliverable sites that have the capacity to deliver **7,921** net additional dwellings over the next five years.
- This represents **144%** of the minimum five year supply target with a 5% buffer (**5511.188** dwellings) or a surplus of 1,379 residential dwellings against the target.
- Hillingdon can therefore demonstrate a **7.2** year supply of deliverable housing sites (rounded), meeting the requirements for a five year supply in Paragraph 74 of the National Planning Policy Framework (2021).

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 2020 to 31st March 2021. Therefore, this report assesses housing land supply for the five year period, starting 1st April 2021 to 31st March 2026.

The document was prepared in March 2021, with information taken from on the 1st March 2021 unless stated otherwise.

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 74 of The National Planning Policy Framework (NPPF) (2021) 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. The Council's Housing Delivery Test measurement for 2021 was 173%. The completion figures showing delivery above the Council's Development Plan target for the previous three years have been provided 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.

	HFR Return	HDT Delivery Figure	Target	Difference
FY20	739	730	1083	-353
FY19	1707	1702	1083	+619
FY18	1036	1023	559	+464

Table 1 – Past 3-year Housing Delivery Performance
--

The table includes the net additional number of dwellings in the official Housing Flows Reconciliation (HFR) return. It also includes the figure that forms the net number of homes delivered part of the Housing Delivery Test (HDT) measurement. The discrepancies are assumed to be from the adjustments made by the Department for Levelling Up, Housing and Communities (DLUHC), however these adjustments are not published so this cannot be confirmed. For the purpose of this document and calculating the five-year supply of housing, it has been assumed that the adjustments have been made correctly and the delivery figure within the HDT measurement is the appropriate figure to use. It should be noted that the ratios applied by the DLUHC mirror those in Paragraph 4.1.9 of the London Plan (2021).

1.5 Data sources

The housing supply target for Hillingdon is taken from the London Plan (2021). 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
- Energy Performance Certificates
- 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 74 of the NPPF (2021) 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.

	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 – 2020/21)	n/a	2,432 ¹
D	Remaining housing required between (2021/22 - 2028/29)	A - C	8,398
E	Number of remaining plan years (2021/22 - 2028/29)	n/a	8
F	Annual minimum target for new homes required in the remaining period	D / E	1,049.75
G	Five year target (01/04/2021 - 31/03/2026)	F x 5	5,248.75
Н	5% buffer	5 % of G	262.44
Ι	Five-year target plus 5% buffer	G + H	5,511 ²

Table 2: Hillingdon's Housing Provision Target

¹ Please see Table 1.

² Rounded from 5511.188

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	3,581	3,380
ii	Sites with Unimplemented Detailed Planning Permission	2,533	2,533
iii	Sites with Approval Subject to S106 Agreement	533	533
iv	Site Allocations	2,341 ³	0
v	Windfall Sites (<0.25ha)	2,950	1,475
TOTAL		11,938	7,921

i) Sites Under Construction

There are a total of 3,581 net additional dwellings on approved schemes that are under construction from sites greater than or equal 0.25ha. Of this figure, 3,380 net additional dwellings are expected to be built in the next five years. The 201 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). 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 2,533 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 four 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. Information provided by the site representatives indicates that their delivery is anticipated within the five year trajectory. The sites have a total capacity of 533 units. Please see Appendix 5 for a full list of sites with approval subject to S106 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 2,341 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 (2021) 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 6 for a full list of these sites.

v) Windfall Sites

Paragraph 71 of the NPPF (2021) 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 71 of the NPPF (2021).

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
- 182 Units approved at Harefield Road, Uxbridge North

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 does 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 7,921 residential dwellings within five years. This represents 144% of the minimum five year supply target (5511.188 dwellings) or a surplus of 2,410 residential dwellings against the minimum target. Accordingly, the London Borough of Hillingdon has a land supply of 7.2 years (rounded).

5 MONITORING

Looking forward, the Council's next Report will be prepared by 31st December 2022 and will set out the five year land supply for the period 1st April 2022 to 31st March 2027.

6 APPENDICES

Appendix 1: Trajectory 1 – Supply of specific deliverable site

		2021/22	2022/23	2023/24	2024/25	2025/26
	Unidentified Windfall Sites (<0.25 ha)	295	295	295	295	295
Stra	tegic Sites With Planning Permission/Prior Approval (<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		262		134	
4	Eastern End of Blyth Road Site B, Botwell	105				
5	Land to South of the Railway, including Nestle Site A, Botwell	367	174	222	310	67
6	Land at 3, 233-236, Nestles Avenue, Botwell				457	
7	Crown Trading Estate, Botwell				120	287
8	Fairview Business Centre Sites A & B, Botwell					400
9	Stanford House (Nestles Ave Site B), Botwell				103	
10	The Arena, Bennetsfield Road, Botwell		12			
11	Harefield Grove, Harefield			22		
12	Bedfont Cross Stanwell Road, Heathrow Villages	52				
13	Master Brewer and Hillingdon Circus Site B, Hillingdon East			61	118	335
14	Former Garage Site Rear of 6-16 Nelson Road, Hillingdon East	6				
15	37 The Drive, Ickenham				7	
16	Land to East of London School of Theology, Northwood				15	

17	Northwood and Pinner Cottage Hospital & Northwood Health Centre, Northwood				70	
18	Building 3, Hyde Park Hayes, (HPH3) Pinkwell			113		
19	Keith House, North Hyde Road, Pinkwell					150
20	HPH4, Millington Road, Pinkwell			60	71	
21	Bourne Court, South Ruislip		35	52		
22	401 Uxbridge Road, Hayes, Townfield		20			
23	Silverdale Road/Western View Site A, Townfield				122	
24	Chailey Industrial Estate Site A, Townfield	86	144	101		
25	RAF Uxbridge, Uxbridge North	19	72	110	77	201
26	Harefield Road, Uxbridge North			182		
27	Randalls Building, Uxbridge South	58				
28	Bridge House, Riverview House & Waterside House, Uxbridge South		141	178		
29	Allport House, 1 Cowley Business Park, Uxbridge South		37			
30	Try House, 2 Cowley Business Park, Uxbridge South				20	
31	Waterside House, 4 Cowley Business Park, Uxbridge South			51		
32	Otter House, 5 Cowley Business Park, Uxbridge South			36		
33	Weir House, Uxbridge South				20	
34	Woodbridge House, Uxbridge South	7				
35	Maple And Poplar Day Centre, Yeading		34			
36	Padcroft Works Site A, Yiewsley					
37	Padcroft Works Site B, Yiewsley			50	54	
38	Land to Rear of Horton Road, Yiewsley	87				
39	Morrisons Supermarket 41-67 High Street, Yiewsley				144	
Tota	al Projected Completions	1082	1226	1645	2137	1831

	Site	Main Application Reference	Capacity
2	Enterprise House, Botwell	11623/APP/2013/3606	96
3	The Old Vinyl Factory, Botwell	59872/APP/2012/1838 + 59872/APP/2019/3852	396
4	Eastern End of Blyth Road Site B, Botwell	68974/APP/2018/2146	105
5	Land to South of the Railway, including Nestle Site A, Botwell	1331/APP/2017/1883 + 1331/APP/2019/1666 + 1331/APP/2019/2314	1140
11	Harefield Grove, Harefield	28301/APP/2013/3104	22
12	Bedfont Cross Stanwell Road, Heathrow Villages	50395/APP/2019/1943 + 50395/APP/2021/1323 + 50395/APP/2021/1322	52
14	Former Garage Site Rear of 6-16 Nelson Road, Hillingdon East	72704/APP/2017/1068	6
21	Bourne Court, South Ruislip	11891/APP/2018/3414	87
22	401 Uxbridge Road, Hayes, Townfield	23799/APP/2017/4648	20
24	Chailey Industrial Estate Site A, Townfield	2102/APP/2018/4231	331
25	RAF Uxbridge, Uxbridge North	585/APP/2009/2752	479
27	Randalls Building, Uxbridge South	41309/APP/2019/1265	58
28	Bridge House, Riverview House & Waterside House, Uxbridge South	40050/APP/2018/1737 + 40050/APP/2020/1009 + 40050/APP/2020/999 + 40050/APP/2021/2467 + 40050/APP/2021/1916	319
29	Allport House, 1 Cowley Business Park, Uxbridge South	46104/APP/2019/2606 + 46104/APP/2020/789	37
34	Woodbridge House, Uxbridge South	20590/APP/2017/3413	7
35	Maple And Poplar Day Centre, Yeading	43762/APP/2018/396	34
36	Padcroft Works Site A, Yiewsley	45200/APP/2017/327	0
37	Padcroft Works Site B, Yiewsley	24843/APP/2018/269	104
38	Land to Rear of Horton Road, Yiewsley	71582/APP/2016/4582	87

Appendix 2: Sites Considered Deliverable: Detailed Planning Permission - 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
7	Crown Trading Estate, Botwell	73955/APP/2020/139	407
8	Fairview Business Centre Sites A & B, Botwell	58758/APP/2019/3517	400
9	Stanford House (Nestles Ave Site B), Botwell	51175/APP/2020/2543	103
10	The Arena, Bennetsfield Road, Botwell	37800/APP/2021/2189	12
13	Master Brewer and Hillingdon Circus Site B, Hillingdon East	4266/APP/2019/3088	514
15	37 The Drive, Ickenham	24043/APP/2020/879	7
16	Land to East of London School of Theology, Northwood	10112/APP/2019/1244	15
18	Building 3, Hyde Park Hayes, (HPH3) Pinkwell	72360/APP/2021/1709 + 72360/APP/2021/2656	113
23	Silverdale Road/Western View Site A, Townfield	71374/APP/2016/4027	122
30	Try House, 2 Cowley Business Park, Uxbridge South	45818/APP/2020/1812	20
31	Waterside House, 4 Cowley Business Park, Uxbridge South	53180/APP/2021/1325	51
32	Otter House, 5 Cowley Business Park, Uxbridge South	63329/APP/2021/1326	36
33	Weir House, Uxbridge South	43495/APP/2020/888	20
39	Morrisons Supermarket 41-67 High Street, Yiewsley	2370/APP/2018/2793	144

Appendix 3: Sites Considered Deliverable: Detailed Planning Permission - Not Started

	Site	Main Application Reference	Capacity
17	Northwood and Pinner Cottage Hospital & Northwood Health Centre, Northwood	23658/APP/2021/1296	70
19	Keith House, North Hyde Road, Pinkwell	27189/APP/2020/2181	150
20	HPH4, Millington Road, Pinkwell	76655/APP/2021/3039	131
26	Harefield Road, Uxbridge North	16299/APP/2020/3313	182

Appendix 5: 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	201

	Site	Indicative Capacity
40	Remaining Land to South of the Railway, including Nestles Ave Site B, Botwell	397
41	Remaining Land to South of the Railway, including Nestles Ave Site C, Botwell	43
42	Charles Wilson Engineers, Charville	34
43	Royal Mail Sorting Office, Manor	22
44	Northwood Station, Northwood	To be determined by design
45	West End Road, South Ruislip	30
46	Chailey Industrial Estate Site B, Townfield	To be determined by design
47	Silverdale Road/Western View Site B, Townfield	119
48	Silverdale Road/Western View Site C, Townfield	240
49	Benlow Works, Townfield	36
50	High Street/Bakers Road Uxbridge	To be determined by design
51	St Andrew's Park (Annington Homes Site), Uxbridge North	330
52	Master Brewer and Hillingdon Circus Site A, Uxbridge North	140
53	Cape Boards, Uxbridge South	315
54	Former Vehicle Testing Station, Yeading	84
55	Hayes Bridge, Yeading	40
56	Trout Road Site A (Kirby and Rainbow Industrial Estates), Yiewsley	343
57	Former Coal Depot, Yiewsley	168

Appendix 6: Excluded site allocations that are not considered to be deliverable within five years.