



New Local Plan Review
RBKC Five Year Housing Land Supply
and Stepped Housing Trajectory
February 2022



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

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1. Introduction

- 1.1 The National Planning Policy Framework (NPPF)¹, (paragraph 68) requires that *“Planning policies should identify a supply of (a) specific, deliverable sites for years one to five of the plan period²; and (b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 1.2 The NPPG Annex 2: Glossary has a specific definition for deliverable and developable sites. These are set out in full in section 5 of this paper.
- 1.3 Paragraph 74 of the NPPF further specifies that, *“strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies³, or against their local housing need where the strategic policies are more than five years old⁴.”* The paragraph then goes on to specify an appropriate buffer (moved forward from later in the plan period). The appropriate buffer for the Borough is 20%⁵ due to the failure to meet the Housing Delivery Test in 2020. The delivery was 49% as opposed to 85%.
- 1.4 This paper sets out:
- A) the Borough’s housing trajectory addressing the requirements of paragraph 68 and 74 of the NPPF. The housing trajectory will be updated annually and submitted as part of the New Local Plan Review (NLPR) for examination in due course.

¹ Last updated 20 July 2021

² Footnote 34 of the NPPF – *“With an appropriate buffer, as set out in paragraph 74. See Glossary for definitions of deliverable and developable.”*

³ Footnote 38 of the NPPF – *“For the avoidance of doubt, a five year supply of deliverable sites for travellers – as defined in Annex 1 to Planning Policy for Traveller Sites – should be assessed separately, in line with the policy in that document.”*

⁴ Footnote 39 of the NPPF - *“Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.”*

⁵ Paragraph 74 (c) of the NPPF – *“20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*⁴¹ Footnote 41 of the NPPF *““This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.”*

B) It provides justification to use a stepped housing trajectory as set out in Policy HO1 of the NLPR, in accordance with the guidance set out in National Planning Practice Guidance (NPPG) on Housing Supply and Delivery⁶.

2. Borough's Housing Need

- 2.1 The London Plan 2021 has identified the housing need for 66,000 additional homes per annum across London (paragraph 4.1.1). Paragraph 4.1.2 of the London Plan clarifies that *“Because of London’s ability to plan strategically, boroughs are not required to carry out their own housing needs assessment⁷ but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA.”*
- 2.2 The standard method for calculating housing need is set out in the NPPG on Housing and Economic Development Needs Assessment. A 35% cities and urban centres uplift was added to the method in December 2020. However, the NPPG (paragraph 34) provides specific guidance for London. It states *that “an uplift applies in London. London is unique in that it has no single city centre which can carry need for the city area. Therefore a 35% uplift is applied to the entire SDS⁸ area (which covers all the London boroughs), rather than to the local authority which contains the largest proportion of London’s population. However, **it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs.**” (emphasis added)*
- 2.3 The Government response to the consultation “Changes to the Current Planning System”⁹ which led to the change in the standard method, made this even more explicit and stated that, *“It is clear that in London, in the medium term, there will need to be a much more ambitious approach to delivering the homes the capital needs. The Secretary of State for Housing, Communities and Local Government expects to agree the London Plan with the Mayor shortly. **This new plan, when adopted, will set London’s housing requirement for the next 5 years. The***

⁶ <https://www.gov.uk/guidance/housing-supply-and-delivery> (paragraph 21)

⁷ Footnote 41 of the London Plan – *“Where boroughs wish to commission their own research on housing requirements to complement the London-wide SHMA, they are encouraged to do this on a sub-regional rather than single-borough basis.”*

⁸ Spatial Development Strategy i.e. the London Plan

⁹ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed.
(emphasis added)

- 2.4 Therefore, in-line with national policy set out above, the NLPR uses the housing need and its distribution as set out in the London Plan. There is a legal requirement to be in general conformity with the London Plan.

3. Borough's Housing Target

- 3.1 The Borough's housing target as set out in the London Plan 2021 is 4,480 homes over ten years. The previous target was 7,330 homes over the same period which was annualised to 733 homes per annum. The previous target was introduced through the Further Alterations to the London Plan in 2015.

4. Stepped Housing Trajectory Rationale

- 4.1 A stepped housing trajectory is supported in certain circumstances both in the London Plan and the NPPG on Housing Supply and Delivery. The following paragraphs set out the rationale.

London Plan

- 4.2 It should be noted that the housing target in the London Plan is a ten-year housing target and is not an annual target. This is clear from paragraph 4.1.7 and Table 4.1 which sets out the targets for each London Borough. Paragraph 4.10 of the London Plan further encourages boroughs to *“set out a realistic and, where appropriate, **stepped housing delivery target over a ten-year period**. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.¹⁰ With the support of the boroughs and taking account of the information published in accordance with Part D, the Mayor will monitor housing supply against targets on a London-wide basis.”*
- 4.3 London Plan Policy H1: Increasing Housing Supply Part D states *“Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.”*

¹⁰ Footnote 45 of the London Plan - This would also fulfil the requirement of a 'Housing Delivery Test action plan'

NPPG on Housing Supply and Delivery

- 4.4 The NPPG on Housing Supply and Delivery (paragraph 21)¹¹ explains when a stepped housing requirement is appropriate for plan-making. It states “A *stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / **or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.** Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.*

*Where there is evidence to support a prioritisation of sites, local authorities **may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g. transport hubs.** These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.”*

- 4.5 It is the case in the Borough that the sites which will deliver most of the housing – the Opportunity Area sites are likely to deliver later in the plan period.
- 4.6 Paragraph 39 of the NPPG further explains that “*Where the adopted housing requirement is stepped, these stepped requirements will be used in the Housing Delivery Test in place of annual average requirement figures. A stepped requirement allows authorities to reflect step changes in the level of housing expected to be delivered across the plan period. The buffer applied to the 5 year housing land supply does not constitute a stepped requirement.*”

Unique nature of the Borough

- 4.7 At the last examination of the Local Plan Partial Review, the Planning Inspector accepted the unique circumstances of the Borough as part of the reason to allow the use of a 5% rather than a 20% buffer in calculating our five year housing land supply. This was acknowledged in paragraphs 70-76 of the Inspector’s report¹². These reasons are still as

¹¹ <https://www.gov.uk/guidance/housing-supply-and-delivery#calculating>

¹² https://planningconsult.rbkc.gov.uk/gf2.ti/f/799106/54172837.1/PDF/-/RBKC_LPPR_Inspectors_Report_July_2019.pdf

valid as they were then and while our housing target has reduced in the London Plan 2021, the Borough's reliance on a limited number of sites means we cannot have a steady and even supply of housing. However, we do have sufficient sites with the capacity and the certainty to demonstrate meeting the London Plan target over ten years as required by the London Plan housing targets.

- 4.8 The Borough is highly constrained being the smallest London borough. It is densely built up with the household density in the Borough at 6,478 households per sq km compared to an average of 155 households per sq km in England and Wales. It has the second highest population density (13,086 residents per sq km) (Table QS102EW Census 2011) in England and Wales. It also has a unique historic environment with nearly three quarters of the Borough within designated conservation areas and 4,000 listed buildings.

Opportunity Area Sites

- 4.9 Given the above context of the Borough, we have a very limited number of large sites. Of these, the two of greatest importance for future development and housing delivery are the opportunity area sites at Kensal Canalside and Earl's Court. Together the sites are earmarked to deliver 4,430 homes in the housing trajectory. However, these sites cannot be included in the first five years due to the reasons set out below.

Kensal Canalside

- 4.10 Since the adoption of the current Local Plan in September 2019, the Council has undertaken significant work to assist delivery on this site. In particular the Kensal Canalside Supplementary Planning Document (SPD) was adopted in July 2021.

- 4.11 The site is 15.4 hectares and based on the Development Infrastructure Funding Study as well as an understanding of development massing, capacity and building heights the NLPR is continuing with the site allocation as a minimum of 3,500 homes. The site requires significant infrastructure works before it can start to deliver new homes. It does not benefit from planning permission at present to provide any certainty of delivery within the first five years.

Earl's Court

- 4.12 Earl's Court site benefits from an outline planning permission (PP/11/01937) granted in 2013 for 930 homes with reserved matters granted for 586 homes in 2014 (PP/13/07062). However, the site is in new ownership and a new scheme is being developed. The site straddles the boundary with London Borough of Hammersmith and Fulham. Planning applications are not expected until late 2022. Given

the scale of the site, the planning application process will take considerable time and it is not realistic to assume that homes will start to be completed within the first five years of the NLPR. There is no evidence as per the NPPF definition of “deliverable” that housing completions will begin on the site within five years.

- 4.13 To enable and support the development on site the Council has been working on evidence to support the site allocation. This includes an Earl’s Court Site Allocation Viability Study prepared by BNP Paribas; an Earl’s Court Commercial Review prepared by Icen Projects; and an Opportunity Area Heights Study, produced by Urban Initiatives Studio, to establish the maximum building heights.

SHLAA 2017

- 4.14 The London Plan Strategic Housing Land Availability Assessment (SHLAA) 2017¹³ uses the following phasing periods for sites (see Table 4.1). The SHLAA 2017 included Earl’s Court within Phase 1 (see Annex E: SHLAA Approvals, page 221) and Kensal Canalside within Phase 5 (see Annex F: SHLAA Allocations, page 244). It is now clear that the SHLAA assumed a shorter lead in time than has turned out to be the case for Earl’s Court and for the reasons set out above it will not be delivered in the first five years. While on Kensal Canalside with the on-going work, we would expect delivery to start happening before Phase 5 of the SHLAA. Nevertheless, neither of the sites will realistically deliver housing completions within the first five years.

Table 4.1 – SHLAA phasing period

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
Start	April 2017	April 2019	April 2024	April 2029	April 2034
Finish	March 2019	March 2024	March 2029	March 2034	March 2041
Years	2	5	5	5	7

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https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

Remaining sites in the SHLAA

- 4.15 The remaining sites in the SHLAA are all site allocations in the current Local Plan. Most of these now have planning permission and some are built out or nearing completion.

Call for sites

- 4.16 The Council undertook a call for sites at the early stages of preparing the NLPR. A separate RBKC Site Allocations Paper, January 2022 has been produced show how each site has been assessed. A three stage assessment was used and many of the sites did not meet the basic criteria set out in Stage 1 such as being below the 5 home threshold for allocation or not being available for development. Based on this assessment all realistic sites are proposed for allocation and these are included in the housing trajectory as shown in Table 6.1 of this document.

Housing Delivery Test Action Plan

- 4.17 The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) introduced the 'Housing Delivery Test' (HDT) in a phased approach over three years. With the publication of the 2020 HDT in January 2021 the transition period is now over. In accordance with the HDT, if housing delivery falls below 95% of a local planning authority's (LPA) adopted housing requirement, that LPA is required to produce a HDT Action Plan.
- 4.18 The 2019 HDT, published in February 2020, showed that 57% of the required homes were built in the Borough between 2016/17 and 2018/19. Therefore, the Council produced a HDT Action Plan, which was published in 2020, to set out what actions would be taken to increase the rate and number of homes built in the Borough.
- 4.19 The subsequent 2020 HDT, published in January 2021, then showed that only 49% of the required homes were built between 2017/18 and 2019/20. As such, the Council reviewed the 2020 HDT Action Plan and produced an updated Action Plan, which was published in 2021. The HDT published in January 2022 has not changed the situation with 43% homes delivered against the requirement.
- 4.20 A summary of the actions taken/will be taken by the Council to increase delivery of homes in the Borough from the updated 2021 HDT Action Plan is set out below:
1. Continue to progress and explore options to build more homes both market and affordable on land in Council ownership, whilst minimising impact on existing communities.

2. Continue to progress the delivery of key sites such as the Kensal Canalside and Earl's Court Opportunity Areas, as well as other key sites.
3. Progress the preparation and delivery of the NLPR to promote and facilitate the delivery of new homes.
4. Promote intensification and mixed-use development in the Borough's Employment Zones through the NLPR.
5. Continue to work with Neighbourhood Forums and local landowners to deliver housing sites allocated in adopted Neighbourhood Plans.
6. Continue to improve communication with residents and communities, agents and developers to ensure effective identification of issues preventing permissions being translated into people's homes through adopted SCI process.
7. Further review of Planning Conditions to accelerate planning permissions being granted and speed up the delivery of new housing.

Protection of other uses in the borough

- 4.21 It is essential to recognise that the housing shortfall cannot simply be addressed by the release of non-residential uses to housing. Such an approach would result in the homogenisation of uses across the borough, contrary to our ambition to maintain a diversity of uses, a thread which runs across the Local Plan. Such an approach would also be in direct conflict with the expectations of national policy, an expectation that *"strategic policies should ... make sufficient provision for a) employment, retail, leisure and other commercial development; and c) community facilities (such as health, education and cultural infrastructure),"* as well as for housing. (Paragraph 20 of the NPPF.) This is also clear in paragraph 8 where the NPPF sets out the different objectives of sustainable development. Whilst the provision of housing is important, sustainable development has three objectives: economic, the social and the environmental. There is a need to *"help build a strong, responsive and competitive economy, by ensuring that sufficient land ... is available"* By the same token we must support the provision of *"accessible services... that reflect current and future needs and support communities' health, social and cultural wellbeing..."*
- 4.22 The need to provide for a balance of uses, to meet the borough's various needs, was supported by the Planning Inspector considering the Council's Local Plan (2019). This included specific reference to the need to protect offices, with the inspector confirming in paragraph 120 of

the examination report¹⁴, that, “*the restriction on the loss of offices is justified*” if the OAN is to be met. Paragraph 123 confirms this is also the case for arts and cultural uses, and that the protection of such uses is “*justified given the importance of the borough’s arts and cultural institutions both locally and at a national and international level. It is also consistent with the approach to planning for cultural facilities set out in paragraph 70 of the NPPF*”. The same can be said of the protection of hotels (paragraph 126).

Offices

- 4.23 The Council recognises that the nature of the office market has changed since the adoption of the Local Plan in 2019. The changing patterns of work resulting from the Covid-19 pandemic are substantial. In order to assess future need, and to address these changing patterns, the Council has recently commissioned an Employment Land Study.¹⁵ This concludes that there is a need for 60,400 sq m of additional office floorspace across the Borough to 2043. This accounts for a model of hybrid working, and a reduction in “need” of 40%, from that otherwise expected. The study concludes that the protection of existing offices will be essential if this future need is to be met. This reflects the Council’s expectation that only limited office/ mixed use proposals are likely to come forward over and above those which are already allocated or which are otherwise in the pipeline.
- 4.24 Whilst the Council is satisfied that there is a significant need for additional office space over the lifetime of the Plan, there is still a substantial differential in value between offices and residential uses. We have carried out a viability assessment¹⁶ which concludes that some 195,000 sq m of the borough’s office stock would be at risk of loss to residential if we do not protect office uses. This loss would be due to the differential in value between the uses and not due to any inherent weakness in the office market. It is essential that we protect our office stock if we are to have the benefits of a vibrant sector, a sector which makes a significant contribution to local employment, to the character of our town centres and which contributes to the local and the wider economy.

¹⁴ [Planning Inspectorate, Report on the Examination of the Royal Borough of Kensington and Chelsea Local Plan Partial Review. \(July 2019\)](#)

¹⁵ RBKC Employment Land Study, Icenl (November 2021)

¹⁶ RBKC Employment Land Study, Icenl (November 2021)

- 4.25 Any gains to the housing stock achieved through changes of use would be more than outweighed by the detrimental impact on the economy, and on the borough's ability to meet its office need.

Retail

- 4.26 In the same way that the loss of existing office stock would hinder the ability of the Council to meet the objectively assessed need for offices, loss of shops to residential would harm the ability to meet the OAN for such uses. Whilst our Retail and Leisure Needs Assessment has identified that there will only be a modest need for additional retail floorspace to 2043 (and only in the convenience sector) we note that any loss would have to be made up before this need could be met.
- 4.27 Of greater importance is the role that Class E retail and other town centre uses have upon the character, the function and the vitality and the viability of our town centres. The Covid-19 pandemic has accelerated changes to the patterns of retailing and the role of town centres, changes which were already underway.
- 4.28 We must support our town centres as the hubs for the community as well as the places which attract visitors from further afield. Shopping will remain the key function, but this will be supported by a range of other town centres uses which increase dwell times or which continue to offer something that the internet cannot. Loss of retail and other town centre uses to residential may reduce the attractiveness of the centre and attract fewer visitors. This may be due to the direct impact of adding dead frontage to our centres, or by reducing the "draw" of the centre through the loss of the uses which attract visitors.

Hotels

- 4.29 The importance of the borough's hotel stock is clear. The report prepared by GLA economics, to inform the new London Plan,¹⁷ notes that Kensington and Chelsea remains the third largest supplier of hotel accommodation within the capital, at 15,151 bedrooms, or 10.4 per cent of London's share. The GLA economics working paper suggests that the supply and demand for hotels in the borough is in balance. As such any loss of hotel space/ bedrooms to residential uses will hinder the borough's ability to meet its need for hotel accommodation over the plan period. It will also have a detrimental impact on a sector which makes a significant contribution to the borough's economy in meeting the accommodation needs of those visiting both the borough and the capital.
- Social and community and cultural uses*

¹⁷ GLA Economics Working Paper 88. Projections of demand and supply for visitor accommodation in London to 2050. (April 2017)

- 4.30 The Local Plan is explicit in seeking to protect all social and community uses. This reflects the role that they play in enabling the community to function. Their role in stimulating a sense of community and providing valuable social infrastructure is essential.
- 4.31 A similar approach is taken for the protection of arts and cultural uses. The Borough is host to more than six hundred arts and cultural organisations. Some are of an international scale, others of more local importance. Together they make the borough the place that it is and add variety and richness to the life of the borough. The protection of such uses is essential.

5. Housing Trajectory

- 5.1 As set out in the introduction to this paper, the NPPF requires the supply of specific deliverable sites, should in addition include a buffer (moved forward from later in the plan period). The buffer can be one of three depending on circumstances - 5% to ensure choice and competition, 10% where the LPA wishes to demonstrate a five-year supply through an annual position statement or recently adopted plan or 20% where there has been significant under delivery over the previous three years¹⁸. The results of the Housing Delivery Test (HDT) are used as the measure of undersupply. The Council delivered 43% housing against the requirements in the 2021 HDT. Therefore, there is a requirement to include a 20% buffer to the first five years of housing supply.

Methodology

Deliverable

- 5.2 The definition of “deliverable” as set out in the Glossary of the NPPF is, *“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*

¹⁸ 39 From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

- 5.3 Paragraph 71 of the NPPF recognises that an allowance for a windfall element can be made. It states that, *“Where an allowance is to be made for windfall sites as part of 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, historic windfall delivery rates and expected future trends.”*
- 5.4 Paragraph 4.1.8 of the London Plan highlights that modelling in the SHLAA shows a capacity for development on small sites for 12,000 new homes a year. It makes it clear that the reliance on this windfall element is part of the policy framework set out in the London Plan. It goes on to state that *“Boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. However, because of the nature of some sites (as set out above), including the particular incremental characteristics of small sites, **boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the numbers set out in Table 4.2.** This is because, in contrast with recent annual trends on small sites, the figures in Table 4.2 are considered to better reflect a minimum baseline for housing delivery given the policy focus on developing small sites for housing in this Plan (Policy H2 Small sites) and the package of measures outlined in the London Housing Strategy.” (emphasis added)*
- 5.5 Sites considered “deliverable” (years 1 to 5 of the trajectory) using the above definition are:
1. **Units under construction (at 1 April 2020) not expected to complete within the current monitoring year.** Assumptions were made that schemes of between 1 and 24 units would be complete within three financial years of the start date. On sites of 25 units or more, the best available site specific information has been used to estimate completions. The larger sites are all shown in Table 8.1.
 2. **Council’s New Homes Delivery Programme (NHDP)** – The Council’s sites being delivered as part of the NHPD have grant funding from the Mayor. A condition of the funding is delivery within a defined period. Therefore, site specific information is available on these sites with certainty of delivery within the first five years.
 3. **Major developments with planning permission but not yet under construction** – these are included as deliverable unless there is clear evidence that homes will not be delivered within five years. As the Borough has a limited amount of major development, site

specific information has been used to inform the years in which these will be delivered.

4. **Minor developments with planning permission but not yet under construction**, in accordance with the NPPF definition of deliverable these are included as unless there is clear evidence that homes will not be delivered within five years. An assumption is made that these will be delivered within years, 3, 4 and 5 of the plan.
5. **A small-sites estimate (windfall element)** is used from year 4 onwards. The figure of 129 pa has been taken from London Plan 2021 (Table 4.2).
6. **Vacant units** - The SHLAA 2017 does not include any allowance for vacant units. Further, the NPPG on Housing Supply and Delivery (paragraph 30) cautions against double counting. Therefore, the trajectory makes no allowance for vacant units brought back into use.
7. **Non self-contained allowance** - The non-self-contained allowance for the borough is 0 units per annum (London SHLAA 2013 and 2017) so does not contribute to any projections within the housing trajectory.

Developable

5.6 The definition of “developable” as set out in the Glossary on the NPPF is *“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*

5.7 Sites considered “developable” (years 6 to 10 and 11 to 15 of the trajectory) using the above definition are:

1. **Opportunity Area sites** – site specific information on Kensal Canalside and Earl’s Court indicates realistic delivery timescales as “developable”.
2. **Proposed site allocations** – site allocations without planning permission and where there is no evidence of delivery within the first five years are considered developable.
3. **Units under construction (at 1 April 2020) not expected to complete within the current monitoring year or included as deliverable**. On sites of 25 units or more, the best available information has been used to estimate completions.
4. **Major developments with planning permission but not yet under construction** – sites not included as “deliverable” are included as “developable”. Site specific information has been used to inform the years in which these will be delivered.

5. **A small-sites estimate (windfall element)** is used from year 4 onwards. The figure of 129 pa has been taken from London Plan 2021 (Table 4.2).
6. **Vacant units** - The SHLAA 2017 does not include any allowance for vacant units. Further, the NPPG on Housing Supply and Delivery (paragraph 30) cautions against double counting. Therefore, the trajectory makes no allowance for vacant units brought back into use.
7. **Non self-contained allowance** - The non-self-contained allowance for the borough is 0 units per annum (London SHLAA 2013 and 2017) so does not contribute to any projections within the housing trajectory.

6. Stepped housing trajectory

- 6.1 Based on a realistic supply of housing in the first five years, the stepped requirement for the Borough should be as set out in Table 6.1. The total target for the first ten years corresponds with the London Plan target but as Opportunity Area sites start to deliver from year 6 onwards, the delivery is stepped down in the first five years and increased in years 6 – 10.
- 6.2 For years 11 – 15, the London Plan paragraph 4.1.11 states *“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”* The opportunity area sites and other site allocations that are likely to deliver in this time period have a capacity of 2,159 homes. In addition, rolling forward the small sites assumptions as set out in the above paragraph of the London Plan adds further capacity for 645 homes. This gives a total of 2,804 homes which can be annualised as 561 homes per annum.
- 6.3 Without the small site assumption, the capacity from site allocations in years 11-15 is 2,159 homes which is about 80 homes below the current London Plan target of 2,240 homes using 448 homes as an annualised figure over five years. Given that this is for the later Plan period, the stepped housing trajectory continues to use 448 dwellings per annum for years 11-15. It should be noted that the NPPF only requires demonstrating a supply for years 11-15 where possible.

Table 6.1: Stepped targets

	Housing target per annum	Target over five years	Adjustment for 20% buffer (brought forward from years 6 to 10)	Annualised figure over five years with adjustments for a 20% buffer
Years 1 to 5 (Deliverable)	300	1,500	360	1,800
Years 6 to 10 (Developable)	596	2,980	536	2,680
Total (years 1 to 10)	-	4,480	-	4,480
Years 11 to 15 (Developable)	448	2,240	448	2,240

7. Five Year Housing Land Supply (2021/22 to 2025/26)

7.1 The housing supply requirement based on Table 6.1 including a 20% buffer for the first five years is 1,800 homes. This will mean an annualised delivery requirement of 360 homes per annum. The Council can demonstrate a supply of 2,129 homes over this period with a surplus of 329 homes. This is a 5.9 years' supply. The table below provides further details. A breakdown including site details is provided in Table 8.1.

7.2 The trajectory (figure 7.1) shows that the opportunity area sites start to deliver homes from year 6 onwards resulting in an increased supply. The cumulative completions over a 15 year period will exceed the housing targets.

Table 7.1: Sources of Five-Year Housing Supply

Estimated Year of Completion	Projected Completions	Small Sites Estimate (from SHLAA 2017)*	Total from all Sources
FY 2021-22	199	0	199
FY 2022-23	303	0	303
FY 2023-24	347	0	347
FY 2024-25	556	129	625
FY 2025-26	466	129	572
Total	1,871	258	2,129



Figure 7.1: Housing Trajectory 2020-21

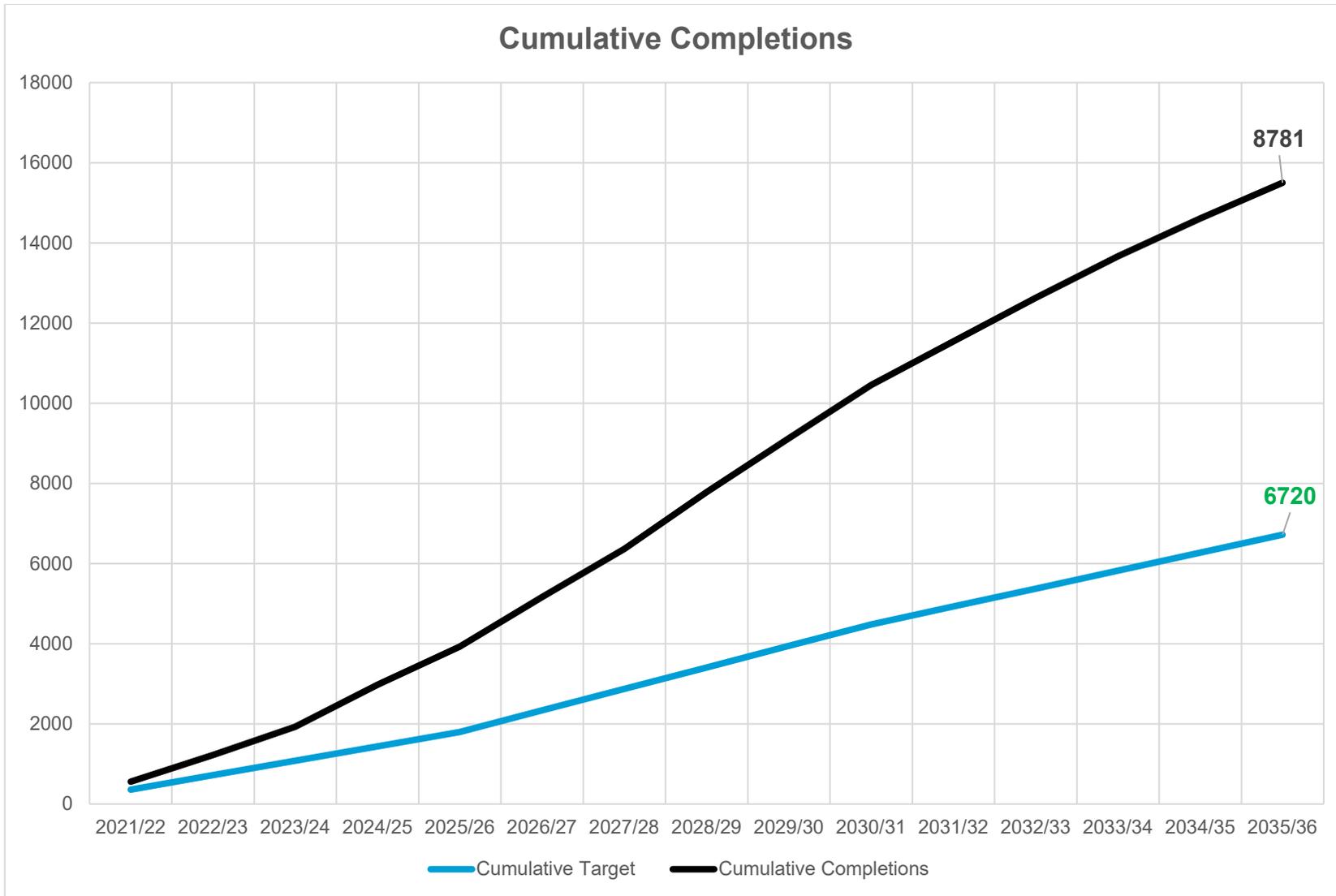


Figure 7.2: Cumulative Completions

8. Years 6 to 10 (2026/27- 2030/31) and Years 11 to 15 (2031/32 – 2035/36)

- 8.1 The sites which make up this element of supply are strategic sites allocated in the Local Plan (with and without planning permission) together with other sites in the planning pipeline which are not progressed enough to include in the first five years. The annual small sites estimate of 129 homes per annum as set out in the London Plan has also been included in the land supply for this period for the reasons set out above.
- 8.2 For years 6 to 10, the requirement based on a stepped trajectory is 2,680 new homes (with an adjustment for the 20% buffer that is moved forward to the first five years). Altogether the target for the first ten years adds up to 4,480 homes as set out in the London Plan. The supply shown for years 6 – 10 is 3,848 homes. This is surplus of 1,168 homes. This is a 7.2 years' supply for this period. Given the nature of the Opportunity Area sites, it is a realistic prospect that these sites will increase the delivery in this time period.
- 8.3 For years 11 to 15, the requirement is 2,240 new homes (448 homes x 5) and the supply shown is 2,804 homes. This is surplus of 564 homes. This is a 6.3 years' supply for this period.
- 8.4 Over the whole 15 years the housing requirement is 6,720 homes and we have demonstrated delivery of 8,781 homes. This is a surplus of 2,061 homes.

Table 8.1: Sites included in the housing trajectory

NLPR Ref/ (Local Plan 2019 Ref) / PP Ref	Site	Current Status	Potential number of dwellings (net)	First Five Years (Deliverable)	Years 6 to 10 (Developable)	Years 11 to 15 (Developable)
Site Allocations (Item 1, 2, 3 of deliverable methodology and items 1, 2, 3, 4 of developable methodology)						
SA1 (CA1)	Kensal Canalside	Site Allocation. SPD adopted July 2021	3,500	0	1,950	1,550
SA2 (CA6)	Earl's Court Exhibition Centre	Site allocation with outline planning permission (and reserved matters for 586 homes)	1,050	0	500	550
SA3 (CA7)	100/ 100A West Cromwell Road	Planning permission	462	362	100	0
SA4 (CA7)	Former Territorial Army site	Planning permission granted	255	0	255	0
SA5 (CA10)	Lots Road South	Site Allocation (Part of the Council's New Homes Delivery Programme)	165	165	0	0
SA6 (CA4)	Land Adjacent to Trellick Tower	Site Allocation (Part of the Council's New Homes Delivery Programme)	60	60	0	0
SA7 (CA12)	Chelsea Farmer's Market	May be required for Crossrail 2 construction. Has planning permission for 59 units	59	0	0	59
SA10 (CA11)	Harrington Road	Site allocation	50	0	50	0
Site allocation removed (CA3)	Wornington Green Phases 3	Phase 2a under construction. Planning application expected for Phase 3	143	43	100	0

Site allocation removed (CA7)	Homebase Site	Planning permission granted – scheme under construction.	152	152	0	0
Site allocation removed (CA9)	Lots Road Power Station	Planning permission granted – under construction	420	420	0	0
Potential Site Allocations in NLPR						
SA8	Units 1 to 14, Latimer Road	Neighbourhood Plan, RBKC SPD	75	10	65	0
SA9	Newcombe House	Planning Permission	35	0	35	0
SA11	Emmanuel Kaye, King's Road	Potential site allocation. Call for sites submission	10	0	10	0
SA12	St Quintin Garage, 142A Highlever Road	Neighbourhood Plan	6	6	0	0
SA13	3 to 5 Crowthorne Road	Neighbourhood Plan	8	0	8	0
SA14	Colebrook Court, Sloane Avenue	Potential site allocation. Call for sites submission	20	0	20	0
SA15	Site at Holland Park Roundabout	Potential site allocation. Call for sites submission	30	0	30	0
Council's New Homes Delivery Programme						
PP/20/00879	175-177, Kensal Road	Planning Permission. Council's New Homes Delivery Programme	37	37	0	0
PP/20/00860	Plot 5-6 Acklam Road, London	Planning Permission. Council's New Homes Delivery Programme	32	32	0	0
PP/20/00844	15-17, Hewer Street	Planning Permission. Council's New Homes Delivery Programme	20	20	0	0

PP/20/00943	54 St Helen's Gardens	Planning Permission. Council's New Homes Delivery Programme	8	8	0	0
	Former Barlby Primary School	Council's New Homes Delivery Programme	83	83	0	0
PP/21/04428	9, Silchester Road	Council's New Homes Delivery Programme	11	11	0	0
	Cheyne Children's Centre (Re-provision of Violet Melchet Centre)	Council's New Homes Delivery Programme	5	5	0	0
Other large sites and major developments						
PP/19/05105	257-265 (Odeon Cinema), Kensington High Street	Under construction	106	106	0	0
PP/15/04338	196 To 222, King's Road and 7 Friese Green House Chelsea Manor Street	Under construction	39	39	0	0
PP/18/00189	232, King's Road (Chelsea Delivery Office) and 18-20 Chelsea Manor Street		23	0	23	0
PP/15/05730	66-70 And 72-74, Notting Hill Gate	Under construction	9	9	0	0

PP/16/00423	K1 Site bounded by Brompton Road, Sloane Street, Basil Street and Hoopers Court, London SW3	Under construction	24	24	0	0
PP/17/00583	Thamesbrook Extra Care Scheme, 2 Dovehouse Street	Under construction	55	55	0	0
PP/18/03491	Chelsea Police Station, Lucan Place	Planning Permission	32	32	0	0
PP/18/05313	Heythrop College, Kensington Square	Planning Permission	106	0	106	0
PP/20/03325	201-207, Kensington High Street		19	19	0	0
PP/21/00272	344-350, Old Brompton Road (Former Tournament Pub)	Planning Application	45	45	0	0
	South Kensington Underground Station, Pelham Street	Refused planning application (PP/20/03216)	29	0	29	0
	William Sutton Estate	Planning Application	-78	0	-78	0
Sub-total						

Total number of dwellings	7,105	1,743	3,203	2,159
Remaining planning pipeline (Item 4 of the deliverable methodology)				
		128	0	0
Small sites estimate from the London Plan (Item 5 of the deliverable and developable methodology)				
		258	645	645
Grand total from all sources				
Total number of dwellings		2,129	3,848	2,804

9. Past undersupply in the borough

- 9.1 The NPPG on Housing Supply and Delivery (paragraph 031) makes it clear that *“Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure.”*

“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.”

- 9.2 In setting the housing need and targets the London Plan evidence has considered previous undersupply. The guidance in the NPPG also means that since the London Plan was published in March 2021, this is the base year. Therefore, the housing trajectory for 2020-21 does not include any previous undersupply. If there is an undersupply in future years this will be added to future updates of the housing trajectory.

Appendix 1 Housing Trajectory Summary Table

Year	Projected Future Completions	London Plan Target (4,480 over ten years)	London Plan Target +20% buffer in first five years*
2021/22	199	300	360
2022/23	303	300	360
2023/24	347	300	360
2024/25	685	300	360
2025/26	595	300	360
2026/27	699	596	536
2027/28	663	596	536
2028/29	883	596	536
2029/30	809	596	536
2030/31	794	596	536
2031/32	639	448	448
2032/33	639	448	448
2033/34	589	448	448
2034/35	498	448	448
2035/36	439	448	448
15 year	8781	6720	6720

*Buffer is added to the first five years. As required in the NPPF, this is moved forward from later in the Plan period. Therefore, the targets later in the Plan period are then adjusted accordingly. In total over 15 years the housing target remains 448 X 15 or 6,720.