

Royal Borough of Greenwich

Housing Delivery Action Plan

Published September 2020 taking account of 2019 HDT Results



I Introduction

- 1.1 This Action Plan has been prepared in response to the Royal Borough of Greenwich's (RBG) 2019 HDT result of 90% delivery against the housing requirement over the previous three year period. As set out in PPG (Paragraph: 047 Reference ID: 68-047-20190722), this HDT Action Plan:
 - Identifies the reasons for under delivery
 - Explores ways to reduce the risk of further under delivery
 - Sets out measures the authority intends to take to improve levels of delivery
- 1.2 RBG has an ambitious growth agenda, and is committed to increasing the supply of new homes, especially genuinely affordable homes. This Action Plan brings together information on the projects, programmes and initiatives currently underway in the Council that contribute to increasing housing delivery into one document. This Action Plan is not a statutory document.
- 1.3 The decision on whether to consult on an action plan, and which stakeholders to involve, is for the local planning authority. RBG has periodic contact with developers/landowners of all major sites in the borough as a matter of course and convenes a landowners' forum in Charlton Riverside; neighbouring boroughs and infrastructure providers are actively engaged as part of both plan-making and decision taking; and smaller developers/land promoters via the agents' forum.
- 1.4 The recent consultation on the Preferred Approach Site Allocations Local Plan (August – October 2019) also involved engagement with these key stakeholders. As such, this Action Plan has been informed by this ongoing dialogue and consultation on this Action Plan is not necessary.

2 Housing Delivery Analysis

- 2.1 The New London Plan sets a target for delivery of 28,240 homes between 2019/20 to 2028/29, equivalent to 2,824 dwellings per annum. This is an increase from the previous target of 2,685 per annum. Both the previous and current target mean that RBG has the third highest housing delivery target in London.
- 2.2 The following analysis focuses on the four years of delivery captured by the previous London Plan housing target. Note that due to the transitional arrangements in place, the HDT housing requirement over the past 3 years is less than the strategic housing requirement set out in the London Plan. However, for the purposes of this Action Plan the council considers it is more robust to consider delivery against the housing targets in the London Plan. These targets are updated as a minimum every 5 years, and once HDT transitional arrangements are no longer in force it is the housing target that delivery will form the basis of the delivery measurement.
- 2.3 Table I sets out the new homes required, as calculated according to the HDT Measurement Rule Book, in comparison to the previous London Plan target. For determining the housing requirement for two of the three years included in the 2019 measurement, the transitional arrangements apply; national household projections are used in the HDT calculation for the housing requirement for financial years up to and including financial year 2017/18 as follows:
 - 2016/17 – housing requirement based on 2012-based household projections

- 2017/18 – housing requirement based on 2014-based household projections

2.4 For years 2018/19 onwards, the HDT housing requirement is calculated as the *lower* of either the latest adopting housing requirement (where this is less than five years old) or the minimum annual local housing need figure (calculated using the standard method set out in the NPPF). Household projections will cease to form any part of the HDT calculation after 2020, and the 2021 HDT calculation will be based solely on the adopted housing requirement, or the local need figure calculated using the standard method where this is lower than the adopted housing requirement.

Table 1 HDT 2019 Measurement compared to London Plan Housing Target

| Year | HDT 2019 Homes Required | Source of 2019 Requirement | HDT 2019 Homes Delivered | London Plan 2016 Housing Target |
|--------------|-------------------------|----------------------------------|--------------------------|---------------------------------|
| 2016/17 | 1,718 | 2012-based household projections | 2,384 | 2,685 |
| 2017/18 | 2,119 | 2014-based household projections | 1,914 | 2,685 |
| 2018/19 | 2,595 | Core Strategy Housing Target | 1,477 | 2,685 |
| Total | 6,432 | -- | 5,775 | 8,055 |

2.5 As set out in Table 2, the Council has granted permission for a net total of 22,087 residential units since 2015/16. This significantly exceeds the previous cumulative four year target of 10,740 (2,685pa x 4 years) and indeed is only 4,763 units short of the previous 10 year requirement of 26,850. This indicates that the Council is granting sufficient permissions to comfortably meet and exceed housing targets.

2.6 If the Peninsula scheme is excluded from the average, over the past four years Greenwich has permitted an average of 2,297 net residential units per year. Obviously the Peninsula scheme has formed a significant proportion Greenwich's housing target in the London Plan since its redevelopment was first permitted in 2004, however removing it from the calculation demonstrates that the Council is not solely reliant on a single strategic scale site in terms of delivery and continues to grant a large number of new residential permissions every year.

Table 2 Net residential permissions granted 1 April 2015 to 31 March 2019

| Year | Net residential permissions granted |
|---------|----------------------------------------|
| 2015/16 | 15,485 (12,898 at Greenwich Peninsula) |
| 2016/17 | 2,191 |
| 2017/18 | 1,402 |
| 2018/19 | 3,009 |

| | |
|-------|--------|
| Total | 22,087 |
|-------|--------|

Source: London Development Database (LDD)

- 2.7 The London Development Database (LDD) also enables Greenwich's performance in terms of housing approvals and completions to be benchmarked against boroughs with similar housing targets. As can be seen from Table 3 performance is broadly similar amongst four of the five boroughs in that cumulative levels of approvals are comfortably above the cumulative target.

Table 3 Benchmarking of Greenwich housing completions/approvals

| Borough | Annual monitoring target | Four year cumulative target | Completions recorded in LDD 2015/16 – 2018/19 | Approvals recorded in LDD 2015/16 – 2018/19 |
|---------------|--------------------------|-----------------------------|-----------------------------------------------|---------------------------------------------|
| Tower Hamlets | 3,931 | 15,724 | 10,277 | 21,412 |
| Southwark | 2,736 | 10,944 | 7,889 | 8,201 |
| Greenwich | 2,685 | 10,740 | 8,095 | 22,087 |
| Barnet | 2,349 | 9,396 | 8,674 | 17,916 |
| Newham | 1,994 | 7,976 | 8,319 | 19,334 |

- 2.8 Turning to completions, Table 4 sets out actual completions in RBG between 1 April 2015 and 31 March 2019 (as recorded in LDD). As can be seen from the table, completions over the past four year average 2024pa. While this does fall short of the housing requirement, it is nonetheless one of the highest average completion rates in London.

Table 4 Housing completions 1 April 2015 to 31 March 2019

| Year | Annual monitoring target | Completions recorded in LDD | Under delivery against annual monitoring target |
|---------|--------------------------|-----------------------------|-------------------------------------------------|
| 2015/16 | 2,685 | 2,487 | 198 |
| 2016/17 | 2,685 | 2,153 | 532 |
| 2017/18 | 2,685 | 1,941 | 744 |
| 2018/19 | 2,685 | 1,514 | 1,171 |
| Total | 13,425 | 8,095 | 2,645 |

- 2.9 Taking the above past permissions and completions figures into account, it is evident that RBG has a ready supply of land for housing delivery, and that a significant amount of housing is delivered year on year. However, there has been a notable slowdown in housing completions over the past four years, despite the council continuing to grant a high number of permissions and the majority of permissions having recorded a 'started' status on LDD.
- 2.10 It is relevant that the majority of completions in RBG are achieved on large sites (greater than 0.25ha) and that a significant portion of these large sites would be classified as strategic scale

sites of more than 500 units where build out periods are phased over 10+ years. Developers bringing forward these sites have the ability to slow down delivery rates in response to the wider macroeconomic uncertainty that has been evident since 2015. While sites are not 'stalled' as development activity is taking place, a number of strategic scale sites have revised their projected completions rates down at least once over the past four year period.

- 2.11 In many cases, this temporary slowing of delivery is accompanied by a review of the development capacity across the later phases of the site, with the results that new permissions have been secured that will deliver overall numbers higher than the original permission. Seeking revisions to scheme will inevitably delay delivery rates, however the tendency to keep permissions under review and seek increases in capacity where this can be supported by available infrastructure can also have positive longer term outcomes by ensuring that strategic schemes are optimising their contribution to delivery and delivering the highest possible quality of development.
- 2.12 Full details (permission date, site area, ownership, units already complete) of the 73 large sites (greater than 0.25ha) within the 15 year housing trajectory are set out in Appendix I of the 2018/19 AMR. Analysis of these sites demonstrates the following:
- The majority of sites are in private ownership, and the majority of sites are in single ownership (land assembly is not required for delivery)
 - All but two of the sites (Gaelic Athletic, Huntsman) are on brownfield land
 - The average site size is 3.86ha, and the median site size is 1.22ha.
 - The average scheme net gain is 700, and the median net scheme gain is 218 units
 - Of those 37 sites with planning permission, 26 have started and 11 have not started
- 2.13 Housing delivery in RBG is reliant on the private sector who in turn vary delivery rates in response to macroeconomic circumstances as well as their own business models, for example holding back delivery to insure that shareholders benefit from a rising market or seeking to sell on the site at profit once permission has been granted. Other than small sites (see below), there is limited public sector land ownership in the borough, which severely constrains direct public sector responses to increasing delivery rates to compensate for slowing down of delivery from privately owned sites. Where there are sites in wider public sector ownership, such as Transport for London (TfL) or the NHS, the Council works proactively through established partnership mechanisms to unlock housing delivery on these sites.
- 2.14 While historically the majority of housing delivery has been from large sites, and as can be seen from the analysis above this will continue to be the case, the amount of delivery from small sites is projected to increase in the future for two reasons, namely:
- The introduction of the Council's direct housing delivery programme (Greenwich Builds) which will introduce a significant new source of supply from small sites that otherwise would not have come forward.
 - The increasing densities achieved on small sites (less than 0.25ha) where these are in sustainable locations. Recent examples include the former Greenwich Police Station with 59 units, Norman House with 63 units and Ravensbourne Wharf with 129 units.

- 2.15 In the short term, while delivery is not directly reliant on the provision of infrastructure, the delay of Crossrail opening by over two years has impacted on the rate at which sites which will benefit from new Crossrail connections are coming forward – primarily the Royal Arsenal in Woolwich, although the impact of this delay on other sites should not be discounted. Similarly, the granting of the consent order for Silvertown Tunnel has necessitated a review of phasing/approach to delivery on Greenwich Peninsula.
- 2.16 In the medium term, RBG is working closely with the GLA and TfL bring forward public transport improvements in the early phases of delivery at Charlton Riverside. There is significant developer/landowner interest in securing early permissions, and early public sector intervention/investment will ensure that the implementation of these permissions is not slowed down by infrastructure requirements. The issue in Charlton Riverside is mainly one of infrastructure coordination and timing of delivery with development values across the area sufficient in the longer term to support delivery of necessary physical and social infrastructure.
- 2.17 Looking longer term, the Thamesmead Waterfront site will become the most significant site in the borough in terms of overall delivery numbers. Capacity at this site is dependent on the extension of the DLR to Thamesmead, and RBG is already working with the GLA, TfL, Peabody and Lendlease to take forward the next stage of the business case for the DLR extension. Funding for the DLR is the biggest challenge to maintaining delivery levels over the long term in Greenwich. This is compounded by the Thamesmead area having the lowest residential values in the borough by some margin, and by far the highest levels of contamination likely at the waterfront site due to its current use as a tip and its former use associated with the Arsenal.

3 Actions and Responses

- 3.1 RBG is already undertaking a wide range of ongoing actions to encourage and speed up the delivery of housing. The package of measures that the Council is already undertaking in facilitating housing delivery are summarised below, having regard to the potential actions identified in PPG. Accordingly, this Action Plan is based on the continuation of the Council's current proactive approach to boosting delivery.

Supply of deliverable/developable sites and engagement with key stakeholders

- 3.2 It is evident that the council has a very healthy pipeline of supply of sites with planning permission in the medium term, complemented by a proactive approach to identified sites in the medium/long term via the Brownfield Register and Site Allocations. It is also evident that actual delivery in the past three years has not achieved projected delivery rates, despite the significant pipeline of permissions and the delivery analysis identifying no meaningful barriers around the nature /typology of sites, land ownership, development values, or infrastructure (see Section 2).
- 3.3 This underscores the fact that delays to planning permissions being built out are largely outside the Council's control. Projections that inform the housing trajectory must be based on information available at the time, including projected completions rates provided by developers themselves. The Council will continue to maintain regular dialogue with developers to ensure that projected completion rates are as robust as possible, and that any unforeseen barriers to delivery are identified as early as possible.

- 3.4 The 2017 London SHLAA identified a comprehensive range of potential housing sites, and remains an accurate assessment of housing land availability in RBG. Potential housing sites are reviewed on an on-going basis as part of keeping the five years supply, housing trajectory and Brownfield Land Register up-to-date. The introduction of the Council's direct housing delivery programme (Greenwich Builds) will further diversify the size and type of sites that are identified as suitable and available for housing development.

Pre-application and application processes

- 3.5 Measures to improve housing delivery are embedded throughout the planning process from policy making to discharge of conditions. The council encourages pre-applications discussions as early as possible for all applications, and offers a bespoke Planning Performance Agreement (PPA) service as well as a comprehensive [pre-application service](#) tailored to the scale of sites. This ensures that any potential issues (including viability, where specialist external advice is sought) are identified early, including those that may impede delivery, which speeds up delivery through swifter grant of permission for schemes that can realistically be delivered, and minimising issues post-permission. The council also supports use of Design Review to ensure quality of schemes coming forward.
- 3.6 To further support the aim of promoting good quality, high density residential development in appropriate locations to optimise the use of brownfield land, the council has recently secured an Urban Design Manager to ensure that the necessary expertise is available to the Council to ensure that the best quality schemes are brought forward and that the importance of good design is embedded in the new Local Plan, as well as being considered at the earliest stages of developing proposals through the PPA process. PPA funding is dedicated towards securing additional capacity to progress schemes at pace as set out above.

Joint working and infrastructure provision

- 3.7 Joint working is also an important aspect of delivery, both in terms of identifying and addressing strategic issues in relation to delivery and in unlocking specific sites for housing development. As set out above, the council works closely with public sector partners to bring forward necessary infrastructure and with public/private sector partners on strategic sites such as Greenwich Peninsula (working with developer on rephrasing of site as a result of Silvertown Tunnel works) and Woolwich Barracks (commitment to produce site-specific SPD to support effective disposal).

Compulsory Purchase Powers

- 3.8 Where necessary and justified, the Council may also support site assembly via CPO powers to enable comprehensive delivery that optimises development capacity. For example, at the Spray Street site (which is on the Brownfield Register) the Council has already agreed to do this formally.

Plan-making

- 3.9 Plan-making also forms an important part of increasing delivery. The Thamesmead OAPF (consultation on draft from December 2019 – March 2020) will provide a strategic framework to large scale change in the area over the next 20 years, and the new Woolwich

Town Centre SPD (consultation expected Spring 2020) has identified how the town centre can accommodate significant additional residential development.

- 3.10 The Site Allocations Local Plan is also in preparation (consultation on Regulation 19 version expected Spring 2020), and it focuses on setting out clear parameters for development on sites that play a role in meeting the objectives of the Core Strategy. It is important to note that the Core Strategy objectives seek to accommodate the full range of development needs in the borough, and as such the Site Allocations must strike a balance for meeting housing needs alongside other development needs.
- 3.11 The Council is also in the evidence gathering stage of the review of the Core Strategy with Detailed Policies. A key aspect of this is the commissioning of a borough-wide Characterisation and Tall Buildings Study. This will identify scope for further intensification and development borough-wide; while the majority of new development will continue to be focused within the identified Strategic Development Locations, the Study has a particular role in supporting appropriate suburban intensification to increase housing delivery from small sites that are not captured by the London SHLAA.

4 Management and Monitoring Arrangements

- 4.1 The Council is committed to meeting and exceeding the housing target identified in the new London Plan, and the actions sets out above reflect that the Council has in place a holistic set of measures to enable achievement of this commitment. The council will continue to actively monitor the progress of development in the borough to ensure that potential delays to delivery are identified early and work with relevant stakeholders to address the issues insofar as possible within the council's powers. Reporting on housing delivery, including this Action Plan and any necessary review of the Action Plan, will be on an annual basis.