

London Borough of Lambeth

**Annual Position Statement: Housing Supply &
Delivery**

October 2018

1. National planning policy

- 1.1. The National Planning Policy Framework July 2018 (NPPF) requires local planning authorities to 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 policies. The supply of specific deliverable sites should in addition include a buffer of 5% to ensure choice and competition in the market for land. Where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement, a buffer of 10% should be included to account for fluctuations in the market during that year. Where there has been a significant under delivery over the previous three years, local planning authorities should increase the buffer to 20% to improve the prospect of achieving the planned supply.
- 1.2. The glossary of the NPPF states that to be considered deliverable, sites 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. Sites that are not major development, and 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 (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 1.3. Authorities should illustrate the expected rate of housing delivery through a housing trajectory for the plan period.
- 1.4. The NPPF introduces the Housing Delivery Test. This is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the areas covered by the Housing Delivery Test, over a rolling three year period. Housing Delivery Test results will be published annually in November by the Ministry of Housing, Communities and Local Government. Where the Housing Delivery Test indicates that delivery has fallen below 95%, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years.

2. Lambeth's Housing Requirement (housing target)

- 2.1. Lambeth's current housing requirement (target) is set in the London Plan 2016 (consolidated with alterations since 2011). A minimum of 15,594 net additional dwellings should be delivered over the ten year period 2015/16-2024/25, which equates to an annual minimum figure of 1,559 net additional dwellings (dpa). The

- previous London Plan (2011) target for Lambeth was 1,195 dpa over the period 2011/12-2020/21.
- 2.2. The London Plan 2016 target is made up of conventional supply, non-self-contained accommodation and vacant dwelling returned to use. Conventional supply comprises net additional self-contained dwellings. Non-self-contained accommodation includes hostels, residential care homes and student accommodation.
- 2.3. Conventional supply and non-self-contained accommodation are not disaggregated within the target. The figures to be used as the monitoring benchmark for Lambeth are as follows:

Table 1: Disaggregated housing target for monitoring purposes for Lambeth 2015/16 to 2024/25

Element of housing supply	London Plan annual monitoring benchmark for Lambeth 2015/16 to 2024/25
Conventional supply and non-self-contained accommodation	1,490
Vacant dwellings returned to use	70
Minimum annual target	1,559

Source: London Plan 2016 Table A4.1

- 2.4. The London Plan 2016 target is derived from the Greater London Authority's 2013 Strategic Housing Land Availability Assessment (SHLAA 2013). The figures for conventional supply in this study were calculated from information about identified large sites (over 0.25 hectares) and an assumption for small sites based on a seven-year historic trend. Of the 1,490 net additional dwellings per annum in Lambeth, 779 (52%) are expected to be delivered on identified large sites and 711 (48%) on small sites, based on the assumptions in the SHLAA 2013. However, this is not a requirement and the proportions in practice can and do vary.
- 2.5. The data for Lambeth is set out in the GLA's document *The London Strategic Housing Land Availability Assessment 2013 (January 2014)*.

3. Monitoring of housing supply in Lambeth

- 3.1. In order to monitor the delivery of housing in Lambeth as required by national policy, the council produces an annual housing development pipeline. This tracks the number of net additional dwellings completed each financial year, as well as units that are expected to be delivered from developments under construction and unimplemented permissions. The most recent report is the *Lambeth Housing Development Pipeline Report 2017/18*, published in September 2018.
- 3.2. As part of this process, housing delivery on identified large sites in the SHLAA 2013 is monitored. This enables an update of the estimated capacity and year of delivery based on actual completions, schemes under construction and unimplemented permissions. This analysis forms the basis of the housing trajectory to demonstrate past and projected delivery of housing (completions) in

Lambeth, and the availability of a five year supply of deliverable land for housing, which is set out in this report.

3.3. Lambeth has a good record of delivery against its housing target over the last ten years. Total housing delivery has outperformed the London Plan targets by a total of 2,053 units since 2008/09. In 2017/18, 1,574 net additional dwellings were completed which is 15 dwellings above the annual target.

Table 2: Record of housing delivery against target in Lambeth (conventional and non-conventional supply)

Year	London Plan target	Net additional dwellings completed	Number of units above or below target
2008/09	1,100	1,412	+312
2009/10	1,100	1,489	+389
2010/11	1,100	1,602	+502
2011/12	1,195	912	-283
2012/13	1,195	725	-470
2013/14	1,195	1,431	+236
2014/15	1,195	1,788	+593
2015/16	1,559	2,505	+946
2016/17	1,559	1,445	-114
2017/18	1,559	1,574	+15
Total	12,852	14,905	+2,053

Source: Lambeth Housing Development Pipeline 2008-2018

3.4. In the three years from 2015/16 to 2017/18, Lambeth's housing delivery was 118% of the housing target in the London Plan. This is set out in table 3 below.

Table 3: Rolling three year average – housing delivery against target

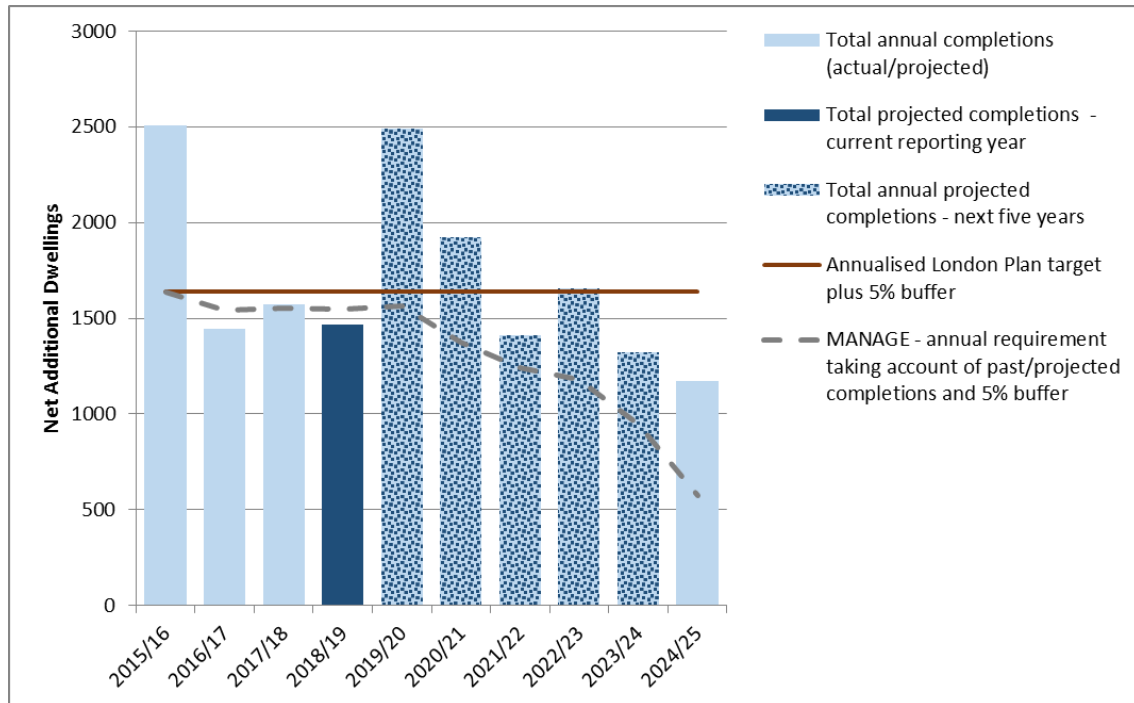
Year	Annual London Plan target	Three-Year target	Net additional dwellings completed – annual	Net additional dwellings completed – three year total	Three year rolling average as % of target
2014/15	1,195	-	1,788	-	-
2015/16	1,559	-	2,505	-	-
2016/17	1,559	4,313	1,445	5,738	133%
2017/18	1,559	4,677	1,574	5,524	118%

Source: Lambeth Housing Development Pipeline 2014-2018

4. Housing Trajectory and Five Year Supply

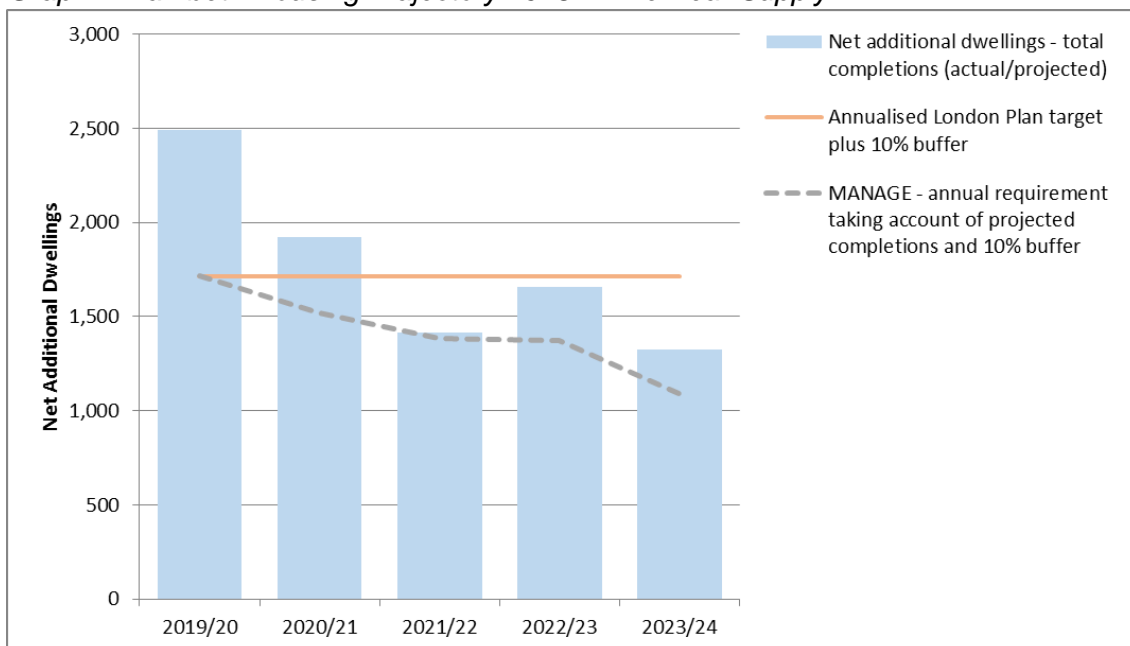
4.1. The latest housing trajectory for Lambeth over the full ten year London Plan (2016) period is set out in Graph 1 and Table 3 below. The housing trajectory for the next five years is illustrated in Graph 2, and includes a 10% buffer on the London Plan target as specified in the NPPF.

Graph 1: Lambeth Housing Trajectory 2018 – Ten Year Supply



4.2. The darker blue bar in graph 1 is the current reporting year 2018/19. The five patterned bars represent the next five years' supply. The dashed grey line, or 'manage line', represents the level and rate of completions required to achieve the full London Plan housing target plus 5% buffer over the ten year period 2015/16 to 2024/25, taking account of actual and projected delivery.

Graph 2: Lambeth Housing Trajectory 2018 – Five Year Supply



- 4.3. The 'manage' line in Graph 2 represents the level and rate of completions required to achieve the full London Plan housing target, plus 10% buffer, over the five year period 2015/16 to 2024/25 taking account projected delivery.
- 4.4. The estimated capacity and year of delivery for each of the SHLAA 2013 large sites, which these projections are based on, is set out in Appendix 1.
- 4.5. The graphs and data show that the rate of completions per annum is likely to fluctuate over the next five years. However, the total number of units completed over the five years is expected to be well above the cumulative target for that period. Predicted fluctuations between the years arise from a number of very large schemes expected to complete during this time, particularly in Waterloo and Vauxhall. For example, most of the residential element of the Shell Centre redevelopment is expected to complete in 2019/20, which accounts for nearly half of the annual housing requirement. Significant parts of Keybridge House and the Sainsbury's redevelopment in Vauxhall are also expected to complete in the same year.
- 4.6. Cumulative completions are predicted to exceed the cumulative target (including the 5% buffer) by 601 dwellings over the full 10 year London Plan period. Over the next five years, cumulative completions are expected to exceed the cumulative target (with a 10% buffer) by 232 dwellings.

Table 4: Lambeth Housing Trajectory (conventional supply and non-self-contained accommodation) 2017/18

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Net additional dwellings – conventional supply, SHLAA 2013 identified large sites	548	663	1,059	686	1,710	1,143	633	874	541	393
Net additional dwellings – conventional supply on small sites + non-self-contained	1,882	762	491	711	711	711	711	711	711	711
Vacants brought back into use	75	20	24	70	70	70	70	70	70	70
Net additional dwellings - total completions (actual/projected)	2,505	1,445	1,574	1,467	2,491	1,924	1,414	1,655	1,322	1,174
London Plan annualised target	1,559	1,559	1,559	1,559	1,559	1,559	1,559	1,559	1,559	1,559
Cumulative completions for 10 year London Plan period	2,505	3,950	5,524	6,991	9,482	11,406	12,820	14,475	15,797	16,971
Annualised London Plan target plus 5% buffer	1,637	1,637	1,637	1,637	1,637	1,637	1,637	1,637	1,637	1,637
Cumulative London Plan target including 5% buffer	1,637	3,274	4,911	6,548	8,185	9,822	11,459	13,096	14,733	16,370
MONITOR - number of dwellings above or below cumulative allocation including 5% buffer	868	676	613	443	1,297	1,584	1,361	1,379	1,064	601
MANAGE - annual requirement taking account of past/projected completions and 5% buffer	1,637	1,541	1,552	1,549	1,563	1,378	1,241	1,183	947	573
Cumulative completions for 5 year supply period	-	-	-	-	2,491	4,415	5,829	7,484	8,806	-
Annualised London Plan target plus 10% buffer	-	-	-	-	1,715	1,715	1,715	1,715	1,715	-
Cumulative London Plan target including 10% buffer	-	-	-	-	1,715	3,430	5,145	6,860	8,575	-
MONITOR - number of dwellings above or below cumulative allocation including 10% buffer	-	-	-	-	776	985	684	624	232	-
MANAGE - annual requirement taking account of projected completions and 10% buffer	-	-	-	-	1,715	1,521	1,387	1,373	1,091	-

5. Non-self-contained accommodation and vacant dwellings returned to use

5.1. Lambeth's record on completions of non-self-contained accommodation and vacant dwellings returned to use since 2008/09 is set out in table 5 below

Table 5: Net additional non-self-contained units and vacant dwellings returned to use in Lambeth since 2008/09 (completions)

Year of Completion	Net additional non-self-contained units	Vacant dwellings returned to use
2008/09	8	309
2009/10	7	344
2010/11	0	313
2011/12	-26	88
2012/13	-14	116
2013/14	383	195
2014/15	310	72
2015/16	1077	75
2016/17	-21	20
2017/18	6	24
Total	1,730	1,556

Source: Lambeth Housing Development Pipeline Data 2008-2018

5.2. Completions of non-self-contained dwellings includes completions of student housing. The most recent information about the student housing pipeline in Lambeth is contained in the Lambeth Student Accommodation Assessment 2017/18.

5.3. In 2017/18 there was a net gain of 6 non-self-contained dwellings. Two schemes were completed that involved additional student accommodation, and one that involved the loss of a large House in Multiple Occupation to conventional accommodation. There are a significant number of student units currently under construction and with unimplemented permission, so the pipeline for non-self-contained dwellings is strong.

5.4. The number of vacant properties returned to use in 2017/18 was 24, which is significantly lower than the anticipated annual benchmark of 70. Council officers responsible for managing the empty homes programme consider that economic uncertainty is a major factor in the downturn, as owners are unwilling to sell or let their properties. A reduction in funding from the Mayor's office has also had a negative impact on the council's work returning empty homes to use.

6. Affordable Housing

6.1. Lambeth Local Plan (adopted September 2015) requires provision of affordable housing on sites of at least 0.1 hectares or capable of accommodating ten or more homes. The policy seeks the provision of 50% affordable housing with grant and 40% without grant, plus a 70:30 ratio of social and affordable rented units to intermediate, subject to viability. This policy replicates the approach in the Lambeth Core Strategy (adopted January 2011) and its predecessor, the Unitary

- Development Plan (August 2007). The Lambeth Local Plan policy must be read alongside London Plan policy and guidance on affordable housing.
- 6.2. In August 2017, the Mayor published the Affordable Housing and Viability SPG, which provides guidance on the threshold approach to Affordable Housing and allows for a fast-track route for applications that propose 35% affordable housing on site without grant and a policy-compliant tenure split. This is a material consideration in decision making. Only one scheme approved in Lambeth before March 2018 was affected, a redevelopment scheme at 44 Clapham Common Southside, which followed the fast-track approach.
 - 6.3. In October 2017, the Council published a Development Viability Supplementary Planning Document (SPD). The aim of this is to increase clarity and transparency in assessments of development viability, particularly as they affect delivery Affordable Housing. It is anticipated that the approach set out in these two guidance documents will result in an uplift in affordable housing approvals over time. However, the timescales involved in major development projects mean that these results are unlikely to be immediate.
 - 6.4. Table 6 below summarises Lambeth's record in delivering affordable housing since 2008/09, measured through net housing completions. Table 7 summarises the record on gross completions over the same period (not taking account of units lost through development). Tables 8 and 9 provide gross approvals figures. Table 8 includes all permissions (including prior approvals); table 9 excludes permission types where affordable housing policies cannot be applied. In addition, table 9 provides information on affordable housing contributions not otherwise included – such as off-site units and payment in lieu (PIL).
 - 6.5. Lambeth's record on affordable housing approvals improved following the adoption of the Unitary Development Plan in August 2007, at which point the policy approach described in paragraph 6.1 had full weight. Overall, the record on both approvals and completions since 2008 is strong, particularly for new build completions, although in recent years there have been marked fluctuations.
 - 6.6. There are a number of factors that explain the relatively lower affordable housing completions and approvals figures in 2017/18. In relation to completions, a number of affordable developments which were expected to complete in 2017/18 were delayed because of additional safety checks required following the Grenfell Tower fire. Fluctuations can also occur due to the phasing of large developments. In 2017/18 there were few completions from large estate regeneration projects, compared to previous years. It is also in part due to a number of office to residential prior approvals schemes, as they provide no affordable housing. In 2017/18, three prior approvals schemes that met the size threshold for providing affordable housing were completed; these could have potentially generated an additional 26 affordable dwellings had they been approved through the standard planning application process.
 - 6.7. In relation to approvals, in addition to on-site affordable units a total of £20,992,000 was secured towards affordable housing during 2017/18 from three large schemes (see Table 9). This sum is significantly higher than the previous three years combined. In each of the three cases, an assumption was made

when the application was determined about the number of affordable units that would result from the payment in lieu. Taken together these amount to 54 units. When looking at affordable units secured through full permissions, the number of in-kind units affordable units plus the additional 54 units amounts to an overall total of 292 units or 24% affordable housing (gross). In practice, units funded by payments in lieu are likely to come forward as permissions in subsequent years.

- 6.8. It should also be noted that a number of schemes with a high proportion of affordable housing were granted permission subject to a s106 agreement in 2017/18, but these permissions will not be recorded in the monitoring figures until the s106 agreements are finalised (likely to be during 2018/19). These include estate regeneration schemes at Knight's Walk and, Clapham Park and Westbury estates, all of which included at least 50% affordable housing.

Table 6: Affordable Housing Completions in Lambeth (net) 2008/09 to 2017/18

Monitoring Year	Residential units completed	Affordable units completed	Affordable units as a % of all units completed	Residential units completed – new build only	Affordable units completed – new build only	Affordable units as a % of all units completed – new build only
2008/09	1,095	567	52%	722	460	64%
2009/10	1,152	420	36%	751	410	55%
2010/11	1,289	694	54%	1,185	688	58%
2011/12	850	348	41%	623	348	56%
2012/13	623	269	42%	506	273	54%
2013/14	853	99	12%	602	97	16%
2014/15	1,406	354	25%	1,053	353	33%
2015/16	1,353	141	10%	752	128	17%
2016/17	1,455	439	30%	1,010	431	43%
2017/18	1,544	294	19%	1,317	294	22%

Table 7: Affordable Housing Completions in Lambeth (gross) 2008/09 to 2017/18

Monitoring Year	Residential units approved	Affordable units approved	Affordable units as a % of all units approved	Residential units approved – new build only	Affordable units approved – new build only (on site)	Affordable units as a % of all units approved – new build only
2008/09	1,275	567	44%	734	460	63%
2009/10	1,498	490	33%	895	480	54%
2010/11	1,388	694	50%	1,191	688	58%
2011/12	1,131	417	37%	696	417	60%
2012/13	801	365	46%	590	351	59%
2013/14	1,461	484	33%	1,070	482	45%
2014/15	1,062	390	24%	1,103	379	34%
2015/16	1,706	388	23%	1,015	372	37%
2016/17	1,624	539	33%	1,093	503	46%
2017/18	1,676	294	18%	1,364	294	22%

Table 8: Affordable Housing Approvals in Lambeth (gross) 2013/14 to 2017/18: all permissions (including prior approvals through which no affordable housing can be secured)

Monitoring Year	Residential units approved	Affordable units approved	Affordable units as a % of all units approved
2013/14	2,576	551	21%
2014/15	5,086	867	17%
2015/16	1,721	465	27%
2016/17	3,383	713	21%
2017/18	1,794	328	18%
Total	16,257	3,410	21%

Table 9: Affordable Housing Approvals in Lambeth (gross) 2013/14 to 2017/18: full permissions plus additional affordable housing contributions secured on previously approved developments¹

Monitoring Year	Residential units approved	On-Site Affordable units approved	Additional Off-Site Affordable Units Secured ²	Total Payment in Lieu (PIL) Secured	Equivalent off-site affordable units secured through PIL ³	PIL Balance ⁴	Total Approved Units, including off-site and PIL equivalent units	Total Approved Affordable Units, including off-site and PIL equivalent units	Affordable units as a % of all units approved
2013/14	2,723	752	0	£362,661	0	£362,661	2,723	752	28%
2014/15	2,989	541	0	£0	0	£0	2,989	541	18%
2015/16	1,350	562	64	£1,720,996	3	£1,087,416	1,417	629	44%
2016/17	1,352	442	0	£204,318	0	£204,318	1,352	442	33%
2017/18	1,176	238	0	£20,992,000	54	£0	1,230	292	24%
Total	9,590	2,535	64	£23,279,975	57	£1,654,395	9,711	2,656	27%

¹ Figures exclude Lawful Development Certificates, Prior Approvals and Reserve Matters applications. Any additional on-site units and/or affordable housing contribution secured where an existing permission has been varied through a minor material amendment application/variation of condition are included.

² Off-site affordable units secured that were granted a separate permission within the same financial year are not included, to avoid double counting

³ Where the Payment in Lieu amount has a specified equivalent quantum of affordable units in the decision report

⁴ Total PIL secured minus PIL which has a specified equivalent quantum of affordable units

7. Conclusion

- 7.1. Lambeth's London Plan housing target was met in 2017/18. The council's record on delivery against London Plan housing targets has been strong over the past ten years. In total 2,053 units more than the cumulative London plan target have been delivered since 2008.
- 7.2. Lambeth is expected to comfortably exceed both its five and ten year housing supply targets. This is illustrated in the updated housing trajectory, and remains true even with the inclusion of a 5% buffer (for ten year supply) or 10% buffer (for five year supply). Over the ten year period 2015/16-2024/25, the cumulative housing target (including the 5% buffer) is likely to be exceeded by 601 dwellings. For the period 2019/20-2023/24, housing delivery is expected to exceed the housing target plus a 10% buffer by 232 units.
- 7.3. Several additional large sites were identified in the 2017 SHLAA, which are expected to deliver housing in the period up to 2024/25 and further strengthen Lambeth's housing pipeline. These sites included development at Fenwick, Knight's Walk and Westbury estates, as well as the council office building Olive Morris House. These figures are not included in the housing trajectories in this report.
- 7.4. While the council's historic record on delivering affordable housing is strong, changing circumstances have resulted in fluctuations. There are a number of factors that explain the relatively lower affordable housing completions and approvals figures in 2017/18, including some delays in completions as a result of additional safety requirements and fewer estate completions than in previous years. In addition, a number of significant estate regeneration projects were approved subject to s106 agreement in 2017/18 but these approvals will not be included in the figures until the s106 agreements are completed, likely to be in 2018/19. Finally, in the last five years, permitted development rights allowing the change of use from office to residential without a full planning application has had a negative impact on affordable housing delivery.
- 7.5. The council published a Development Viability SPD in October 2017 to increase clarity and transparency in development viability assessments, particularly as they affect delivery of affordable housing. This complements the Mayor's Affordable Housing and Viability SPG published in August 2017. It is anticipated the impact of these guidance documents will start to affect affordable housing delivery in 2018/19 and beyond.

Appendix 1 – Delivery of conventional Housing on identified large sites in Lambeth (SHLAA 2013) position at end March 2018

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Completed										
176-188 Acre Lane SW2										
187 - 191 Clapham Road, SW9										
2 to 24 Kennington Lane		65								
25 - 33 Macaulay Road, SW4	16									
34 - 36 Bedford Road, SW4		40								
340 Clapham Road & 9 Jeffrey's Road			78							
35 - 51 Bedford Road, SW4	75									
368 - 372 Coldharbour Lane, SW9										
4 – 14 Union Road & 342-344 Clapham Road SW4	77									
Clapham Park Estate Poynders Road, Clapham Park Estate, SW2										
Claremont East Housing Estate Garden Lane, SW2	35									
Former Annie McCall Hospital and 37 and 39 Jeffrey's Road										
Former Beaufoy Institute										
Former Lilian Baylis School	86									
Hampton House, 20 Albert Embankment, SE1			162							
Keybridge House			53							
ICE RINK, CHURCH, BUS GARAGE, 382, 386 - 390 STREATHAM HIGH ROAD (Streatham Hub)										
Land at St Agnes Place, SE11		52								
Land Bounded By Barrhill Road, Blairderry Road And Ardwell Road, SW2										
Land by Waterloo Road, Baylis Road, & Pear Place		9								
Loughborough Park Estate SW9	-10		27							

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Completed (continued)										
Megabowl site - Wentworth House and 142-170 Streatham Hill, SW2			254							
Myatts Field North Housing Estate, SW9	102	266								
Offley Works, 44 and 46	9									
Parliament House, 81 Black Prince Road										
Plot Opposite 251-275 Milkwood Road	42									
Redmayne House, Sidney Road, SW9										
Sainsbury's, Wandsworth Road		222	246							
St George Tower Site										
Unigate depot, 129 Valley Road										
Various sites within Stockwell Park & Robsart Estates SW9	116									
Vauxhall Sky Gardens, 143-161			239							
Westow Hill & 10-20 Crystal Palace Parade		9								
Under Construction										
18-22 Parry Street/ 72 Bondway/ 96 Wandsworth Road						335	243			
363-365 Clapham Road					28					
86-88 Gresham Road					71					
Elthelred Nursery				89						
Hampton House, 20 Albert Embankment, SE1				90						
IMO Building & Westminster Tower					28					
Keybridge House				149	268					
Land adjacent to railway line, Avenue Park Road SE27						42				
Land Bounded By Doon Street & Upper Ground SE1										
Loughborough Park Estate SW9				125	124					
Mandrell Road SW2				16						
Pascal Street SW8									166	166

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Under Construction (continued)										
Sainsbury's, Wandsworth Road					231					
Shell Centre, 2-8				98	779					
Thrayle House					101					
Vauxhall Bondway					80	370				
Vauxhall Island Site, Vauxhall Cross										
Your New Town Hall - Triangle Site				119						
Unimplemented										
12-20 Wyvil Road London										
Elizabeth House										
Livity School						43				
Loughborough Junction - Higgs Industrial Estate							129			
Somerleyton Road								192		116
Texaco Garage Albert Embankment							83	83		
Westow Hill & 10-20 Crystal Palace Parade										
Permission Subject to S106										
44, Clapham Common South Side						293				
512 - 522 Streatham High Road, SW16						60				
Clapham Park Estate Poynders Road, Clapham Park Estate, SW2							21	327		1
ITV Centre							106	107		
Current Application										
260-367 Norwood Road (Site 18)							51			
Kennington Gas Holders - OAKDA									210	80
Pre-Application										
Various Sites								165	165	30

Note: Three identified sites were the subject of active pre-application discussion at the end of March 2018, with the expectation of planning permission and delivery during the ten year plan period. Assumed figures have been included in the housing trajectory for these sites.