

Sutton Local Plan

Five-Year Housing Land Supply Assessment 2024-25 to 2028-29



April 2024

Contents

ONE	Background to the Assessment	2
	Purpose of the Document	2
	National Planning Policy Context	2
	Housing Delivery Test – Time Period	3
	Five-Year Housing Land Supply - Time Period	3
TWO	Housing Delivery Test	4
	Housing Delivery Test calculation	4
	Housing requirement for LB Sutton over the last three years	4
	Table 2.1 Sutton's Housing Requirement over the last three years	4
	Housing delivery in LB Sutton over the last three years	7
	Table 2.2 Sutton's Housing Requirement over the last three years	5
	Housing Delivery Test Outcome for LB Sutton	5
THREE	Five-Year Housing Land Supply Assessment	6
	Five Year Housing Requirement	6
	Table 3.1 Five Year Housing Delivery Requirement in LB Sutton	6
	Identification of Sites	6
	Assessing Deliverability	6
	Table 3.2 Rationale for assessing deliverability	7
	Five-Year Housing Land Supply Analysis	8
	Table 3.3: Five-Year Housing Land Supply Analysis	8
FOUR	Conclusions	14
	Housing Delivery Test Outcome for LB Sutton	14
	Five-Year Housing Land Supply Assessment 2023-24 to 2027-28	14
	Risks to Deliverability	14
	Historic Delivery Patterns	14
	Table 4.1: Completions against Local Plan Target 2012-13 to 2021-22	14



Section 1: Background to the Assessment

Purpose of the Document

1.1 The purpose of this document is two-fold:

- (1) Housing Delivery: To report on progress in building out housing sites which have planning permission over the last three-years by reference to borough housing requirements in line with the government's Housing Delivery Test; and
- (2) Housing Supply: To identify a supply of specific deliverable sites within the London Borough of Sutton sufficient to provide a minimum of five years' worth of housing against the housing targets set out in the adopted Sutton Local Plan (February 2018), including a 5% buffer to ensure choice and competition in the market for land.

National Planning Policy Context

1.2 The Revised National Planning Policy Framework (NPPF) (December 2023)¹ sets out the following requirements for local planning authorities:

Para. 76

Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met: a) their adopted plan is less than five years old; and b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.

In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing41, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).

Para. 79

"To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years".

1.3 In identifying the 'number of homes required' for the purpose of monitoring housing delivery and assessing future housing supply, the council has taken account of Paragraph 12 of the Government's Housing Delivery Test Measurement Rule Book which states that:

<u>Para. 73</u>

"Where the latest adopted housing requirement figure is less than five years old, or has been reviewed

¹ the Revised NPPF (DHCLG, February 2019) is available on the GOV.UK website at https://www.gov.uk/government/collections/revised-national-planning-policy-framework

and does not need updating , the figure used will be the lower of:

• **EITHER** the latest adopted housing requirement, including any unmet need from neighbouring authorities which forms part of that adopted housing requirement. This requirement will be the stepped housing requirement (or the annual average requirement where there is no stepped requirement). This is the case for:

(i) Districts or boroughs where the requirement is set out in a district or borough local plan. Where a spatial development strategy is also in place, the district or borough plan requirement will continue to be used until it is more than five years old, or the requirement has been reviewed and found not to require updating

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(iv) Spatial development strategies (SDS), where the district or borough plan requirement is older than 5 years old and needs updating, an apportioned requirement set out in the SDS will be used.

• **OR** the minimum annual local housing need figure (and any need from neighbouring authorities which it has been agreed should be planned for, and which has been tested at examination) for that authority calculated with a base date of 1st April each year".

1.4 In accordance with the above guidelines, **the council has used the London Plan 2021 housing target of 469 net additional dwellings per year** as HDT figure for 2021-22 and the minimum cumulative housing target for the five-year period from 1 April 2024 to 31 March 2029.

1.5 Each of the 'Five-Year Housing Land Supply Assessments' published by the council over the last five years has been able to demonstrate that the London Borough of Sutton has sufficient land to meet its minimum housing requirements. Furthermore, Sutton's Authority Monitoring Report (AMR) 2021-22 shows that since 2012-13, the housing target has been exceeded in 10 out of the 10 years and the total net housing completions within the Borough have exceeded the cumulative target by 1,367 net additional dwellings. This indicates that there is no record of persistent under delivery in LB Sutton that would require the application of a 20% buffer. Therefore a 5% buffer has been applied in accordance with the NPPF.

Housing Delivery Test – Time Period

1.6 The council's Housing Delivery Test in Section 2 of this document covers the previous three-year reporting period (2020-21, 2021-22, 2022-23).

Five-Year Housing Land Supply - Time Period

1.7 The council's Five-Year Housing Land Supply Assessment in Section 3 of this document runs from 1 April 2024 to 31 March 2029.



Section 2: Housing Delivery Test

Housing Delivery Test calculation

2.1 The Housing Delivery Test is a percentage measurement of net additional dwellings delivered against the number of net additional dwellings required as set out in the relevant strategic policies, over a rolling three-year period.

Housing Delivery Test (%) = Total net homes delivered over three year period Total number of homes required over three-year period

Housing requirement for LB Sutton over the last three years

2.2 Sutton's cumulative housing requirement over the previous three-year period (2019-20, 2020-21 and 2021-22) is set out below in Table 2.1

2.3 However, this monitoring period coincided with the national coronavirus lockdown announced on 23 March 2020, was an unprecedented event which saw widespread disruption to society, including the construction sector. In recognition of this the Government, as part of the Housing Delivery Test measurement, reduced the 'homes required' within the 2020-21 year by four months (156 units for Sutton), giving Sutton a Housing Delivery Test figure of 313.

		-	
Year	Annual Housing Target	Cumulative Housing Target	Source of Target
2020-21	313 (*469)	313 (*469)	London Plan (Mar 2021)
2021-22	469	792 (*938)	London Plan (Mar 2021)
2022-23	469	1,261 (*1,407)	London Plan (Mar 2021)
	Three-year cumulative target	1,261	
2020-23	+ 5% NPPF buffer	63	
2020-23	TOTAL	1,324 net additional dwellings required	
	Sutto	n Local Plan 2016-31 / London Plan 2021	

Table 2.1 Sutton's Housing Requirement over the last three years

Housing delivery in LB Sutton over the last three years

2.4 Housing delivery in Sutton is monitored on an ongoing basis using the GLA's London Development Database (LDD)² and reported annually in Sutton's AMR. The number of net additional dwellings delivered in LB Sutton over the previous three-year period (2019-20, 2020-21 and 2021-22) is set out below in Table 2.2.

² the LDD can be accessed via the GLA website at https://www.london.gov.uk/what-we-do/planning/london-plan/london-development-database

Table 2.2 Sutton's Housing Requirement	t over the last three years
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Year	Annual Housing Delivery	Cumulative Housing Delivery	Excess of Cumulative Target
2020-21	335	335	-
2021-22	633	968	+176
2022-23	390	1,358	+34

	Three-year housing delivery	1,358 net additional dwellings delivered								
2020-21 to	Three-year housing requirement									
2022-23	(including 5% NPPF buffer)	net additional dwellings required								
2022-25	Housing delivery in excess of	-								
	housing requirements	net additional dwellings								
	Sutton Authority Monitoring Report 2022-23									



Section Three: Five-Year Housing Land Supply Assessment

Five Year Housing Requirement

3.1 Table 3.1 shows that the total borough housing requirement over the next five years from 1 April 2023 to 31 March 2028, is 2,462 net additional dwellings, taking account of the housing target of 469 net additional dwellings per annum and the 5% NPPF buffer. The council therefore needs to demonstrate that there are sufficient deliverable housing sites within the borough to meet this requirement.

Year	Local Plan Target	Cumulative Target
2024-25	469	469
2025-26	469	938
2026-27	469	1,407
2027-28	469	1,876
2028-29	469	2,345
	5-year cumulative target	2,345
	+ 5% NPPF buffer	117
	TOTAL	2,462
	TOTAL	net additional dwellings required
		Sutton Local Plan 2016-31

Table 3.1 Five Year Housing Delivery Requirement in LB Sutton

Identification of Sites

3.2 Sites with potential to deliver housing during the next five years from 2024-25 to 2028-29 come from the following sources:

- residential sites that are currently under construction as of March 2024;
- residential sites that have planning permission but are 'not started' as of March 2024;
- large sites that are allocated in the Local Plan 2018 but currently do not have planning permission;
- sites which have 'prior approval' and which have come forward as a result of the permitted development right, introduced in May 2013, that allow offices to be converted to residential dwellings;
- specific unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the five-year period; and
- small 'windfall' sites (fewer than 10 net additional dwellings)

Assessing Deliverability

3.3 All sites within a five-year housing land supply assessment must be 'deliverable'. The Glossary to the Revised NPPF (Annex 2) states that:

"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); and (b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

3.4 For the purposes of this five-year housing land supply assessment, Table 3.2 sets out the rationale that has been adopted by the Council with regard to deliverability.

Source of Site	Criteria for Assessing Deliverability	NPPF Category
(a) Sites with planning permission currently under construction	Sites with planning permission and currently under construction which are projected to be delivered during the five-year supply period (2024-25 to 2028-29).	(a)
(b) Sites with planning permission currently 'not started'	Sites with planning permission which are currently 'not started' as of March 2024 but projected to be delivered during the five- year supply period (2024-25 to 2028-29). However, prior approval sites which are currently 'not started' are covered under category (d) below.	(a)
(c) Large allocated sites currently without planning permission	This category includes those sites allocated for residential development in the Sutton Local Plan 2018 which do not currently have planning permission but are considered likely to be delivered during the five-year supply period (2024-25 to 2028-29). Site allocations with planning permission as of March 2021 (i.e. those which are either 'not started' or 'under construction)' are included in Sections (a) and (b) above.	(b)
(d) Prior approval sites currently 'not started'	This category includes all residential sites which have 'prior approval' but which are currently 'not started'. Note: In May 2013, the Government introduced a new permitted development right that allows the conversion of offices to residential dwellings without planning permission subject to 'Prior Approval'. However, an Article 4 direction for Sutton Town Centre came into force in January 2015 which removes these permitted development rights within the town centre boundaries.	(a)
(e) Significant unallocated brownfield sites	This category includes unallocated brownfield sites which are (i) available -without ownership problems (ii) suitable - has been or is very likely to be granted permission) and (iii) achievable - the owners intend to develop, at least part of the site, within the period 2024-25 to 2028-29).	(b)
(f) Small sites fewer than 10 net additional dwellings	This category includes a small sites 'windfall' estimate based on average annual completions over the last 10 years (as set out in the Authority Monitoring Report 2022-23	

 Table 3.2 Rationale for assessing deliverability

Five Year Housing Land Supply Analysis3.5 Table 3.3 sets out a five-year housing land supply analysis for the Borough for 2024-25 to 2028-29.

Local Plan Allocation	Site	Location	Planning Application?	Permission Date	Status?	Delivery date?	Total Site Capacity	Units Completed before 5YS period	Total Net Completions forming part of 5YS	Notes
(A) SITES	WITH PLANNING PERMIS	SSION AS OF	MARCH 2023 -	- CURRENTL	Y UNDER COI	NSTRUCTION				
STC21	Sutton Park House, 15 Carshalton Road	Sutton Town Centre	DM2020/00754	30/09/2021	Under Construction	Year 1 of the five- year period.	149	0	149	Site is nearing completion
STC11	8-25 Beech Tree Place and 29-35 West Street, Sutton	Sutton Town Centre	DM2021/02331	24/06/2022	Under Construction	Year 3 of the five- year period.	92	0	92	This is a Council owned site and scheme which is now under construction.
n/a	Prince Regent Pub, High Street, Sutton, SM1	Sutton Town Centre	DM2020/00532	04/11/2020	Under Construction	Year 1 of the five- year period.	30	0	30	None.
n/a	Crosspoint House, 28 Stafford Road, Wallington, SM6 9AA	Wallington	DM2021/01434	23/09/2021	Not Started	Year 1 of the five- year period	28	0	28	Under construction.
n/a	102-104 Rose Hill, Sutton, SM1 3HB	Rosehill	DM2022/00615	22/05/2020	Under Construction	Year 2 of the five- year period.	16	0	16	None.
S33	Former HSS Hire, Malden Road	Cheam	DM2020/00306	02/09/2021	Under Construction	Year 1 of the five- year period.	13	0	13	Granted on appeal.
n/a	Gower House, Woodcote Road, SM6 0PU	Wallington	DM2022/00278	30/11/2022	Under Construction	Year 1 of the five- year period.	11	0	11	Due to completed in October 2024
S47	1-9 Windsor Road & 81-85 Central Road, Worcester Park	Worcester Park	A2014/70583	23/12/2014	Under Construction	Site is expected to be delivered in 2022-23	9	0	9	None.
n/a	Norman House 70 Cheam Road Sutton	Sutton Town Centre	DM2019/01771	21/04/2020	Not Started	Complete in 2022- 23	13	13	0	None.
					•	SUB-TOTAL	361	0	348	
(B) SITES	WITH PLANNING PERMIS	SION BUT N	IOT STARTED A	AS OF MARCI	H 2023				·	
STC36	Chalk Gardens, B And Q Plc, Sutton Court Road, SM1 4RQ	Sutton Town Centre	DM2022/01764	19/12/2023	Not Started	Year 4-5 of the five-year period.	970	0	970	Site clearance anticipated to begin before the end of 2024.

Local Plan Allocation	Site	Location	Planning Application?	Permission Date	Status?	Delivery date?	Total Site Capacity	Units Completed before 5YS period	Total Net Completions forming part of 5YS	Notes
STC29	St Nicholas House, St Nicholas Way, Sutton	Sutton Town Centre	DM2019/01309 DM2022/00013	26/10/2021 Pending consideration	Not Started	Year 4 of the five- year period.	276	0	276	A subsequent application (DM2022/00013) was submitted in Jan 2022 for 281 units.
STC39	Land to rear of Times Square, Throwley Way, Sutton, SM1 1LF	Sutton Town Centre	DM2020/01573	30/11/2022	Not started	Year 5 of the five- year period.	113	0	113	None.
S35	Former Victoria House, 388 Malden Road, Cheam SM3 8HY	North Cheam	DM2021/02555	22/12/2023	Not started	Year 5 of the five- year period.	74	0	74	Approved at committee in February 2023 subject to a Section 106 agreement.
S51	Haredon House, London Road, North Cheam, SM3 9BJ	North Cheam	DM2020/00828	11/08/2023	Not Started	Year 3 of the five- year period.	50	0	50	None.
STC6	2-4 Lodge Place, Sutton, SM1 4AU	Sutton Town Centre	DM2019/01977	09/08/2021	Not started	Year 4-5 of the five-year period	48	0	48	Granted on appeal. Applications to clear conditions are currently being made and approved.
STC19	Helena House, High Street, Sutton	Sutton Town Centre	DM2020/00476 DM2022/01530	13/10/2021 Pending consideration	Not Started	Year 4-5 of the five-year period.	41	0	41	Granted on appeal. Subsequently a prior approval has been submitted for change of use to 27 flats (Pending consideration). In addition, an appeal in in progress (DM2021/02062) for 2 extra storeys to deliver a further 12 units.
STC35	Copthall House, Grove Road, Sutton SM1 1DA	Sutton Town Centre	DM2020/00816	25/04/2023	Not Started	Year 3 of the five- year period.	32	0	32	None.
n/a	69-71 Brighton Road And 2	Sutton Town Centre	DM2022/02085	7/6/2023	Not Started	Year 3 of the five- year period.	28	0	28	None.

Local Plan Allocation	Site	Location	Planning Application?	Permission Date	Status?	Delivery date?	Total Site Capacity	Units Completed before 5YS period	Total Net Completions forming part of 5YS	Notes
	Cavendish Road									
	Sutton, SM2 5BT,									
n/a	10-12 Cheam Road, Sutton	Sutton Town Centre	DM2020/00570	18/05/2021	Not Started	Year 3 of the five- year period.	25	0	25	Conditions currently being cleared and is expected on site in 2023.
n/a	219-227 Sutton High Street, Sutton, SM1 1LB,	Sutton Town Centre	DM2022/02131	27/07/2023	Started	Year 2 of the five- year period.	21	0	21	Site has permission for a 38 room HMO. London Plan allows non self-contained accommodation to count towards housing supply on a 1.8:1 ratio.
n/a	Griffiths Close, 209 Cheam Common Road, Cheam	Cheam	DM2019/01773	12/05/2020	Not Started	Year 2 of the five- year period.	15	0	15	Conditions have been cleared and the scheme is expected on site in 2023.
n/a	1-3 High Street, Sutton, SM1 1DF	Sutton Town Centre	DM2020/00217	30/11/2020	Not Started	Year 2 of the five- year period.	10	0	10	None.
n/a	38 - 40 Benhill Avenue Sutton, SM1 4DA	Sutton Town Centre	DM2021/00438	29/11/2021	Not Started	Year 2 of the five- year period.	10	0	10	None.
	<u>I</u>	.	ļ			SUB-TOTAL	1,713	0	1,713	
(C) LARG	E ALLOCATED SITES WI	TH NO PLAN	INING PERMISS	SION AS MAR	CH 2023					
STC45	Elm Grove Estate, Sutton Town Centre	Sutton Town Centre	No.	N/a	Not started	Year 5 of the five- year period.	272	0	272	Outline Planning permission submitted. Due for determination in September 2024.
SCT9	Civic Centre Site, St Nicholas Way, Sutton, SM1 1EA	Sutton Town Centre	No.	N/a	Not Started	Partial completion	165	0	165	This is a Council site being brought forward by the Council as a <u>key</u> <u>regeneration scheme</u> in Sutton TC, linked to the redevelopment of the Council-owned shopping centre. The Council has begun public consultation

Local Plan Allocation	Site	Location	Planning Application?	Permission Date	Status?	Delivery date?	Total Site Capacity	Units Completed before 5YS period	Total Net Completions forming part of 5YS	Notes
										on proposals. Capacity based on Site Allocation.
STC10	Secombe Theatre, Cheam Road, Sutton	Sutton Town Centre	No	N/a	Not started	Year 5 of the five- year period	93	0	93	This is a Council site being brought forward by the Council as a <u>key</u> <u>regeneration scheme</u> in Sutton TC. The Council has begun public consultation on proposals. Capacity based on Policy 7 of the Local Plan.
STC31	Gibson Road Car, Gibson Road, Camden Road, Sutton	Sutton Town Centre	No	N/a	Not started	Year 5 of the five- year period	178	0	178	This is a Council site being brought forward by the Council as a key regeneration scheme in Sutton TC. The Council has begun public consultation on proposals. Capacity based on Policy 7 of the Local Plan.
S52	Council Offices, Denmark Road, Carshalton	Carshalton	No.	N/a	Not Started	Year 4 of the five- year period	24	0	24	Council owned site being brought forward by the Council-owned development company. Currently having pre- application discussions on the site. Offices have been vacant since the pandemic.
S53	Council Car Park, Denmark Road, Carshalton	Carshalton	No.	N/a	Not Started	Year 4 of the five- year period	18	0	18	Council site being brought forward by the Council- owned development company. Currently having pre-application discussions on the site. Car park have been vacant since the pandemic.

Local Plan Allocation	Site	Location	Planning Application?	Permission Date	Status?	Delivery date?	Total Site Capacity	Units Completed before 5YS period	Total Net Completions forming part of 5YS	Notes
STC8	North of Greenford Road, 2-4 Greenford Road, Sutton	Centre	No.	N/a	Not Started	Year 5 of the five- year period	12	0	12	The eastern part of the sites has completed, delivering 6 dwellings. However, the western part of the site is currently have pre-app discussions with Council.
STC2	Former Morrison's Local and Car Park, SM1 1LW	Sutton Town Centre	DM2021/00042	Pending consideration	Not Started	Year 4 of the five- year period	9	0	9	The indicative figure from the allocation has been used and is expected to complete by the middle of period.
						SUB-TOTAL	771	0	771	
(D) PRIO	R APPROVAL SITES									
n/a	Oceantech House, Station Approach, Cheam, SM2 7AU	Cheam	DM2020/01973 DM2020/01974 DM2022/00226 DM2023/00642 DM2023/00669	20/01/2021 20/01/2021 05/04/2022 Pending consideration	Not started	Year 3 to 4 of the five-year period.	28	0	28	The site has consent for conversion to 16 units and 2 additional storeys provide a further 12 units. Two new applications have been submitted totalling 24 units.
n/a	Harrow Lodge, 28 Eaton Road, Sutton SM2 5EE	Sutton	DM2023/01827	21/03/2024	Not Started	Year 3 of period	10	0	10	Upward extension.
	1	•			•	SUB-TOTAL	38	0	38	
(E) UNAL	LOCATED BROWNFIELD	SITES								
N/a	2-4 Copse Hill and 52-54 Brighton Road, Sutton, SM2 6AD	Sutton Town Centre	DM2022/02277	Pending consideration	Not Started	Year 3 of the five- year period	43	0	43	Planning application being considered.
n/a	93 Sherbrooke Way, Worcester Park	Worcester Park	DM2021/01792	07/07/2022	Under construction	Year 1 of the five- year period.	23	0	23	Development being implemented
n/a	Cloverdale Court, 10 Stanley Park Road, Wallington, SM6 0EU	Wallington	DM2019/01775	21/04/2020	Under Construction	Year 3 of the five- year period	22	0	22	Development being implemented one.

Local Plan Allocation	Site	Location	Planning Application?	Permission Date	Status?	Delivery date?	Total Site Capacity	Units Completed before 5YS period	Total Net Completions forming part of 5YS	Notes
n/a	Trickett House, 125 Brighton Road, Sutton	Sutton	DM2019/01776 DM2023/00196	01/05/2020 02/03/2023	Not started	Year 3 of the five- year period	17	0	17	Conditions have been cleared and a start on site is expected imminently.
n/a	The Grove House, Grove Park, Carshalton, SM5 3AL	Carshalton	DM2021/00090	Pending Consideration	Not Started	Year 1 of the five- year period	10	0	10	Council owned property being converted to flats.
						SUB-TOTAL	115	0	115	
(F) SMAL	L SITES (FEWER THAN 1)	0 NET ADDI	FIONAL DWELL	INGS)						
n/a	Borough-wide	Borough- wide	Over the last five years an average of 145 net additional dwellings were completed on small sites (fewer than 10 units). As such a small sites windfall allowance of 725 net additional dwellings over the five year period has been included.					725	145 net dwellings per annum x5 = 725 net dwellings over the period.	
TOTALS										
(a) Sites with planning permission currently under construction							361	13	348	The Five Year Housing Land Supply Assessment
(b) Sites with planning permission currently 'not started'							1,713	0	1,713	demonstrates that LB Sutton has sufficient land to meet and exceed in Five Year Target (+ the 5%) by 1,248 net additional
(c) Large allocated sites currently without planning permission							771	0	771	
(d) Prior approval sites currently 'not started'							38	0	38	
(e) Significant unallocated brownfield sites							115	0	115	dwellings or 50%). This equates to 7.5 years' worth
(f) Small sites fewer than 10 net additional dwellings								0	725	of supply.
5-YEAR SUPPLY TARGET								2,345		
5-YEAR SUPPLY TARGET WITH 5% BUFFER							2,462			
						TOTAL	3,723	13	3,710	
FIVE YEAR SUPPLY TOTAL 3,710 (+1,248 or 50							.1%)			



Section Four: Conclusions

Housing Delivery Test Outcome for LB Sutton

4.1 The outcome of the Housing Delivery Test in Section 2 shows that, as of 1 April 2032, the Council has delivered a total of 1,358 net additional dwellings over the previous three-year period (202-210, 2021-22 and 2022-23) against a cumulative housing requirement of 1,324 net additional dwellings (including the 5% buffer).

4.2 This equates to a housing delivery score of **103%** for the borough.

1,358 homes delivered 1,324 homes required = 103%

Five-Year Housing Land Supply Assessment 2024-25 to 2087-29

4.3 Table 3.3 in Section 3 demonstrates that there is sufficient available housing land within the borough to meet and exceed the council's five-year housing requirement of 2,462 net additional dwellings for the period 1 April 2022 to 31 March 2027, incorporating the housing target of 469 net additional dwellings per annum and the additional 5% buffer required by the NPPF.

- **4.4** This five-year assessment identifies a total supply of 2,958 net additional dwellings, comprising:
- 348 net additional dwellings currently under construction;
- **1,713** net additional dwellings on sites with planning permission but not started;
- 771 net additional dwellings on large allocated sites but currently without planning permission;
- **38** net additional dwellings on sites with 'prior approval'; and
- 115 net additional dwellings on significant unallocated brownfield sites; and
- **725** net additional dwellings on small sites fewer than 10 dwellings (windfalls).

4.5 This total of 3,710 net additional dwellings:

- exceeds the council's five-year cumulative housing requirement of 2,462 net additional dwellings (incorporating the 5% buffer) by 1,248 net additional dwellings (+50.1%);
- equates to 7.5 years of supply based on the council's five-year cumulative housing requirement; and
- equates to an average supply of 742 net additional dwellings per annum over the five-year period.

Risks to Deliverability

4.6 The council is confident that the larger sites in this document will be developed; the risk arises as to when they will be delivered. In discussions with landowners and developers, the council has noted that some developers have only been able to give vague timescales of development and completion dates, however, they have stated their intention to develop within the five year period.

Historic Delivery Patterns

4.7 Table 4.1 below sets out Sutton's performance against the London Plan housing targets over the last 8 years from 2011-12 to 2022-23. Net additional housing completions delivered over this period were 4,162 units, thus exceeding the cumulative target by 1,658 units.

Year	Net Addition	al Dwellings	Difference	Torgot Mot2	
Tear	Target	Completions	Difference	Target Met?	
2011-12	210	580	+370	✓	
2012-13	210	227	+17	✓	
2013-14	210	340	+130	✓	
2014-15	210	439	+229	✓	
2015-16	363	406	+43	✓	
2016-17	427	639	+212	✓	
2017-18	427	697	+270	✓	
2018-19	427	575	+148	✓	
2019-20	427	559	+132	✓	
2020-21	313*	335	+22	✓	
2021-22	469	633	+164	✓	
2022-23	469	390	-79	X	
Total	4,162	5,820	+1,658	✓	

Table 4.1: Housing Completions against London Plan Targets 2011-12 to 2022-23

* This monitoring period coincided with the national coronavirus lockdown announced on 23 March 2020. In recognition of this the Government, as part of the Housing Delivery Test measurement, reduced the 'homes required' within the 2020-21 year by four months (156 units for Sutton), giving Sutton a Housing Delivery Test figure of 313.