

Bexley Local Plan Monitoring Report

2023/2024

Executive summary

What this local plan monitoring report includes

The Council, as local planning authority, is required by legislation to prepare and publish reports containing information as to the extent to which the policies set out in the local plan are being achieved, as well as a number of other pieces of related information. In line with these statutory duties, this local plan monitoring report sets out information on:

- Plan making progress on local plans or supplementary planning documents specified in the local development scheme
- Duty to cooperate activities
- Community infrastructure levy receipts and expenditure
- Performance against monitoring indicators for local plan policies

This report monitors the above information for the time period from 1 April 2023 to 31 March 2024. In addition, where relevant (for example with the updated local plan housing trajectory), the report monitors policy performance from the start of Bexley's Development Plan period, which is from 1 April 2019. Bexley's plan period ends on 31 March 2038. Annex 1 at the back of the report sets details of the housing trajectory and demonstrates a five year housing land supply from 1 April 2025 to 31 March 2030.

Plan making progress

The [Bexley Local Plan](#), and its accompanying [Local Plan Policies Map](#), was adopted 26 April 2023. This was in line with the timetable in the [Bexley Local Development Scheme](#) and within the monitoring period of this report. The Bexley Local Plan forms part of Bexley's Development Plan alongside the London Plan 2021.

The review of the Council's extant supplementary planning documents (SPD) is included in the Bexley Local Development Scheme, with several replaced by the adoption of the Bexley Local Plan and others to be replaced when the Council adopts its Design Guide SPD, which is currently in production.

Duty to cooperate

Duty to cooperate is set out in planning legislation and includes activities such as the preparation of development plan documents and other local development documents. The Council has cooperated with a number of other local planning authorities, including adjoining boroughs, and other prescribed bodies, on a variety of issues throughout the reporting year.

Community Infrastructure Levy

The Council issued demand notices for £2.27m of CIL in the reporting year, collected £1.96m in CIL receipts, and spent £903,000 of CIL on a number of infrastructure projects including signage, traffic sensors, the Erith regeneration programme, and the Albion Road Surgery scheme. Funds have also been allocated to a number of future infrastructure schemes. The Council's infrastructure funding statement, published annually and found on the [Community Infrastructure Levy \(CIL\)](#) webpage, provides further information.

Local Plan policy monitoring

This report monitors the effectiveness with which the Bexley Local Plan policies have been implemented in the reporting year, using the monitoring indicators (including some just for context) to assess the Council's progress towards achieving the plan's objectives. Importantly, the performance monitoring focuses on what is in the Council's control – determining planning applications – and how sustainable the development is that is secured for the borough through this process. Table 1 below provides a high level summary on the performance of the Bexley Local Plan policies, by theme, during the 2023/2024 reporting year and cumulatively from the start of the development plan period where relevant.

Monitoring the extent to which the policies set out in the Bexley Local Plan are being achieved

Bexley’s growth: delivering more sustainable communities

The Council, as local planning authority, approved 84% of all planning applications it determined during the reporting year, rising to a 100% approval rate for major residential development schemes. Creating sustainable communities sits at the heart of the newly adopted local plan, with policies that take a positive approach to development of the right types in the right locations. The Local Plan’s spatial strategy sets out the sustainable development locations in Bexley, and 80% of dwellings approved in the reporting year were in these areas. The Council's commitment to a 'brownfield first' approach saw 88% of applications approved on previously developed land and a low level of approvals(0.17%) departing from the development plan (e.g. on the Green Belt).

Bexley’s homes: promoting mixed and balanced communities

Local Plan housing policies include a strategic policy that sets an overall figure (the ‘housing trajectory’) of 13,015 (net) new homes over the 19-year development plan period, broken down by size, type and tenure of housing needed for different groups in the community. An annual housing target of 685 allows for monitoring year on year, and for the reporting year the number of new homes both approved and completed exceeded the annual target. Cumulatively from the start of the plan period, the number of new homes from planning approvals is 125% of the requirement, with completed housing at 92% although this is anticipated to be 100% by the end of the plan period as the Local Plan site allocations get built out with new housing and smaller, windfall sites continue to come forward. Both low cost rent and intermediate affordable housing (London living rent and shared ownership) has been secured through planning approvals of qualifying developments, with 35% affordable housing (from all tenures) achieved during the reporting year.

Bexley’s economy: strengthening our prosperity

The borough’s designated industrial locations were consolidated with the adoption of the Local Plan. Whilst only several planning applications were approved in the reporting year, sites coming forward are being intensified for appropriate business uses, in line with the strategic policy ambitions for Bexley’s industrial land to work harder. There is a healthy amount of development pipeline for industrial uses with 88,821m² of net additional floor space.

Bexley’s town centres are performing well on the whole over the plan period with overall vacancy rates lower than the national average – 11 out of Bexley’s 13 town centres (one major, five district and seven local) were below the 10% vacancy target at the end of the reporting year, with an average of 6.5% vacancy across all town centres.

Bexley’s character: reflecting our diversity and heritage through high-quality design

Local Plan policies seek to both protect these features whilst ensuring that development opportunities that make the most of the borough’s character and its heritage assets can come forward. There was no loss of a listed building, locally listed building or landmark building in a conservation area as a result of an approved development proposal, nor any that would impact a protected view. In addition, with the exception of the existing redevelopment at the former Erith Quarry, there were no approvals for new development that exceeded appropriate building heights.

Bexley’s wellbeing: providing community facilities and enhancing our environment

Local Plan policies focus on ensuring that development in the borough both contributes to the provision of, as well as the protection and enhancement of, community services and facilities, green and blue infrastructure, and the ecology of the borough. There was a net gain in community facilities and there was no net loss of publicly accessible open space. However, 0.5ha of designated open space was lost as a result of an approval for one new development.

Monitoring the extent to which the policies set out in the Bexley Local Plan are being achieved
Bexley’s infrastructure: provision and management of resources for good growth
The performance of the Local Plan policies in this section are assessed to ensure that sufficient provision is made for infrastructure for transport, waste management, water supply, wastewater, and minerals and aggregates. In the reporting year 99.6% of dwellings approved were within an accessible distance to public transport and there were 15 approvals for car free residential developments.
Bexley’s climate: adapting to and mitigating the effects of climate change
The Local Plan policies that are monitored in this section focus on ensuring that proposals for new development in the borough address climate change in a coordinated manner. In the reporting year all relevant planning approvals achieved a minimum 35% reduction beyond building regulations, with an average reduction of 51%. Any residual emissions (to bring developments to net zero) were then offset via payments into the Council’s carbon offset fund. With regards to flood risk management, in the reporting year no approvals were granted contrary to Environment Agency or Lead Local Flood Authority advice.
Monitoring the overall performance of Local Plan policy usage
In the reporting year 208 applications were refused where a Local Plan policy was cited as a reason for refusal. The most common issues that appear to arise in refusals are design, transport issues, harm to heritage assets and green infrastructure, and the impacts of infill development on the surrounding area. Of the 208 refusals, 12 have been subject to appeal. Nine of these appeals were dismissed and three were allowed. Given the limited amount of data that can be gathered from a single reporting year it is difficult to draw conclusions although it does appear that whilst design-related policies are the most used as a basis for refusing applications, they are also the most subjective and therefore the most vulnerable at appeal. However, for the majority of appeal decisions the Council’s original decision is being upheld, and there are no policies that are clearly performing more poorly than others.

Table 1: High level summary of Bexley Local Plan policy performance

Bexley’s five year housing land supply (Annex 1 of this local plan monitoring report)

For the purposes of demonstrating a five year housing land supply for development management, this is the five year period following on from the current financial year after the reporting year, which for this 2023/2024 monitoring report is from 1 April 2025 to 31 March 2030.

In line with the NPPF, a 5% buffer has been added to the requirement and this total requirement is used to determine the number of years of supply. The figures in Table 2 below are extrapolated from the housing trajectory. Further details of the housing trajectory and the five year housing land supply are set out in Annex 1 at the end of this local plan monitoring report.

Demonstrating a five year housing land supply	
Five year total identified housing land supply capacity (net dwellings)	4,020
Bexley's housing requirement (685 multiplied by 5 years + 5% NPPF buffer)	3,596
Number of years' supply measured against the housing requirement	5.6 years
Supply as a percentage of the housing requirement (with 5% NPPF buffer)	112%

Table 2: Headline capacity figures (net dwellings) from the five year housing land supply assessment

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1. Introduction

- 1.1. The Council, as local planning authority, is required by planning legislation to monitor and report on the extent to which the policies set out in its local plan are being achieved. Additionally, a local planning authority's monitoring report is required to include information on:
 - plan making progress as identified in the local development scheme
 - neighbourhood development orders or plans (where these have been made)
 - duty to cooperate activities
 - community infrastructure levy receipts and expenditure (where a report has been prepared)
- 1.2. The Bexley Local Plan, and its accompanying Local Plan Policies Map, was adopted on 26 April 2023. This was within the reporting period of this monitoring report, and in line with the timetable in the Bexley local development scheme. The Bexley Local Plan forms part of [Bexley's Development Plan](#) alongside the London Plan 2021. These are the primary policy documents on which planning applications are considered in the borough.
- 1.3. The London Plan, as the spatial development strategy for London, provides the strategic framework; however the Bexley Local Plan contains both strategic and non-strategic policies and it is the performance of these local plan policies that are being assessed in this monitoring report. [The performance of the London Plan](#) is monitored separately by the Mayor of London.
- 1.4. This is the first monitoring report for the Bexley Local Plan, covering the first year from adoption. The 'monitoring' or 'reporting' year is from 1 April 2023 to 31 March 2024. The start of the plan period for Bexley's Development Plan is 1 April 2019 to align with the beginning of the plan period for the current London Plan, as some of Bexley's requirements are set out in London Plan policies. Therefore, the performance of some policies has been analysed for the reporting year as well as from the start of the plan period, where appropriate and where the information is available.

2. Plan making progress

- 2.1. The Government's [National Planning Policy Framework](#) (NPPF) sets out requirements for plan making in line with planning legislation. Local plans should be prepared with the objective of contributing to the achievement of sustainable development. An up to date plan should provide a positive vision for the future; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 2.2. A local plan is required to be reviewed within five years of its adoption, although changes to strategic policy requirements or exceptional circumstances can trigger an early review. Following the review, local plans should be revised and updated where necessary. In the reporting year the NPPF was updated by the government twice (September 2023 and December 2023).

Implementing the Bexley local development scheme

- 2.3. Local planning authorities are required to produce a local development scheme (LDS) under the [Planning and Compulsory Purchase Act 2004](#). The [Localism Act 2011](#) also maintains the requirements to produce an LDS and keep it up to date. The LDS is a rolling programme management plan, which identifies the local development documents that the local planning authority proposes to produce over a three years period, setting out the timetable for when these documents are expected to be consulted upon and adopted.

- 2.4. The [Bexley LDS](#) that is relevant to this local plan monitoring report covered the time period from October 2019 to June 2023. The Bexley Local Plan was adopted on 26 April 2023 in line with the LDS timetable. It will be reviewed by April 2028 unless a new NPPF changes the requirements or exceptional circumstances trigger an early review.
- 2.5. No other local development documents were included in the Bexley LDS timetable; however a full review of the Council's supplementary planning documents was carried out and the actions from this review are set out in Table 3 of the Bexley LDS. There were 14 extant adopted guidance documents reviewed, with outcomes linked to adoption of the Local Plan (and OAPFs for Bexley Riverside and Thamesmead and Abbey Wood); the Bexleyheath Town Centre Masterplan; the Design Guide SPD; and the development of sites. The Design Guide SPD is currently in production. An update to the SPD review will be set out in the Council's next LDS).

3. Duty to cooperate

- 3.1. [Section 110 of the Localism Act 2011](#) created the duty to cooperate requirement in relation to the planning of sustainable development by inserting [Section 33A into the Planning and Compulsory Purchase Act 2004](#). Bexley has a duty to cooperate with a number of other local planning authorities, including adjoining boroughs, and bodies prescribed by [Regulation 4 in Part 2 of The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#). The duty includes activities such as the preparation of development plan documents and other local development documents. Details of exercising the duty in the reporting year are set out below.

Duty to cooperate activities undertaken in the reporting year

Active joint working arrangements in place

- Key partner of the Crossrail to Ebbsfleet (C2E) project with the GLA, TfL, Kent County Council, Dartford Borough Council, Gravesham Borough Council, Ebbsfleet Development Corporation, Thames Gateway Kent Partnership and Network Rail to develop a business case for extending Crossrail 1 (the Elizabeth line) to Ebbsfleet
- Chair of the southeast London joint waste working group, with the other southeast London boroughs and the City of London, to pool London Plan waste apportionment allocations, to keep up to date a joint waste technical paper (key evidence in the preparation of local plans) and to respond to duty to cooperate requests with regards to waste matters
- Support authority to the GLA in the production of the London Local Nature Recovery Strategy, attending consultation events and workshops
- Support authority to the Thames Estuary Partnership in the preparation of a refresh of Thames Strategy East, which will provide supplementary riverside planning guidance in line with the Environment Agency's TE2100 riverside strategy approach
- Key financial support for Thames 21 and the North West Kent Countryside Partnership, enabling the organisations to deliver environmental improvement projects within the borough

Regular partner meetings with defined tasks, including statements of common ground

- Member of the A282 Junction 1a A206 Corridor Improvements Steering Group with National Highways, Kent County Council and Dartford Borough Council
- Duty to cooperate meetings with planning authorities and other prescribed bodies addressing strategic policy areas including evidence base work and the preparation of statements of common ground, which are live documents informed by regular communication between the parties. Key stages of local plan preparation triggers a review of these statements

- The GLA's Planning for London LAND4LDN programme, contributing to a new SHLAA that will support preparation of a new London Plan and new local plans for London boroughs
- The GLA's Planning London Datahub (PLD) residential starts and completions exercise
- London Green Infrastructure Framework workshops, developing a vision and scope for a new framework that will target and prioritise green and blue infrastructure across London
- Thames Tidal Councils Forum, supporting the recommendations in the Thames Estuary 2100 Plan through collaborative working with the Environment Agency to share opportunities, discuss challenges and solutions, and report progress through an operational governance route
- Historic England liaison meetings regarding the Council's Historic Environment Record, archaeology and listed buildings
- The Council's Transport Users' Sub-Committee that brings together Members with TfL, Southeastern, Network Rail, the police and other transport related organisations
- Regular meetings with TfL and other London boroughs regarding proposed London river crossings such as Gallions Reach in association with the proposed DLR extension between Becton and Thamesmead and the Blackwall Tunnel STIG (Silvertown Tunnel Implementation Group) meetings
- London Waste Planning Forum, which meets quarterly to assess the evidence feeding into London Plan policies on waste, provide updates from each subregional waste planning group, and agree statements of common ground with regional waste planning authorities outside of London covering key strategic cross-boundary waste matters (Bexley is a unitary waste planning authority)
- London Aggregates Working Party, a regional technical advisory body that meets quarterly and is responsible for the preparation of the annual monitoring report for aggregates in London (Bexley is a minerals planning authority)
- Partnership working with Registered Providers with assets in the borough to enable estate regeneration and wider regeneration projects
- Attending meetings with Vattenfall to discuss development of the Riverside Heat Network (RHN), a project that aims to provide low-carbon heating and hot water to homes and businesses in the Bexley Riverside area
- Greenspace Information for Greater London (GiGL) biodiversity net gain (BNG) advisory group, attending meetings to support the implementation of BNG in London (Bexley is an SLA partner to GiGL)

Regular attendance at regional informational meetings

- Association of London Borough Planning Officers – to discuss best practice, planning matters relevant to London and to update on borough's local plan progress
- London Boroughs Community Infrastructure Levy Collection Group – to discuss progress and implementation of the community infrastructure levy
- London Boroughs Infrastructure Network – to promote collaboration on the planning, capacity and delivery of London's infrastructure
- London Boroughs Viability Group – to discuss viability matters with regards to plan making
- London Boroughs Biodiversity Forum – to support the delivery of the statutory duty
- Planning Advisory Service Biodiversity Net Gain Practitioners Network – to share best practice
- Lower Thames Crossing stakeholders advisory updates – as part of the submission of this infrastructure project to the Secretary of State

Information provided through duty to cooperate and other requests

- Consultation responses provided to adjoining and other relevant planning authorities relating to planning applications and local plans
- Formal responses provided for duty to cooperate requests regarding waste processed within the borough, from waste planning authorities across the country
- Participated at London Plan workshops and provided consultation responses to the Mayor’s Draft Strategies and London Plan Guidance

4. Community infrastructure levy reporting

- 4.1. The [Community Infrastructure Levy](#) (CIL) is a financial mechanism the Council can use to capture value from new developments in order to deliver infrastructure. Most development involving the creation of additional floorspace will be liable to pay the levy.
- 4.2. The Council is required to publish an annual infrastructure funding statement providing details of the CIL collected and spent in that reporting year (as well as details of s106 planning obligations and planned infrastructure projects), and to provide a summary of the information in the local plan monitoring report.
- 4.3. The summary information is included in Table 3 below and should be read alongside the Council’s infrastructure funding statement for further detail.

Matters included in the annual CIL report	Amount of CIL
The total value of CIL set out in all demand notices issued in the reporting year	£2,273,611
The total amount of CIL receipts for the reporting year	£1,961,819
The total amount of CIL receipts, collected by the authority, or by another person on its behalf, before the reporting year but which have not been allocated	£517,059
The total amount of CIL receipts, collected by the authority, or by another person on its behalf, before the reporting year and which have been allocated in the reporting year	£1,112,923
The total amount of CIL expenditure for the reporting year	£903,000
The total amount of CIL receipts, whenever collected, which were allocated but not spent during the reporting year	£805,000
In relation to CIL expenditure for the reported year, summary details of—	
1. the items of infrastructure on which CIL (including land payments) has been spent, and the amount of CIL spent on each item: <ul style="list-style-type: none"> • flood risk management • playground improvement programme • Erith regeneration programme • Albion Road Surgery scheme • parking improvements in Felixstowe Road • Bexleyheath signage • Sidcup signage • traffic count sensors 	<p>£37,000</p> <p>£39,000</p> <p>£209,000</p> <p>£338,000</p> <p>£235,000</p> <p>£7,000</p> <p>£3,000</p> <p>£35,000</p>
2. the amount of CIL spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part)	£0

Matters included in the annual CIL report	Amount of CIL
3. the amount of CIL spent on administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation	£145,817
In relation to CIL receipts, whenever collected, which were allocated but not spent during the reported year, summary details of—	
1. the items of infrastructure on which CIL (including land payments) has been allocated, and the amount of CIL allocated to each item: <ul style="list-style-type: none"> • flood risk management • playground improvement programme • Erith regeneration programme • traffic and road safety improvement schemes • Carlton hub • lenses Abbey events space • tree planting 	<p>£183,000</p> <p>£59,000</p> <p>£274,000</p> <p>£150,000</p> <p>£80,00</p> <p>£5,000</p> <p>£54,000</p>
The amount of CIL passed to—	
1. any parish council under regulation 59A or 59B; and	£0
2. any person under regulation 59(4);	£0
Summary details of the receipt and expenditure of CIL to which regulation 59E or 59F applied during the reported year including—	
1. the total CIL receipts that regulations 59E and 59F applied to	£0
2. the items of infrastructure to which the CIL receipts to which regulations 59E and 59F applied have been allocated or spent, and the amount of expenditure allocated or spent on each item	£0
Summary details of any notices served in accordance with regulation 59E, including—	
1. the total value of CIL receipts requested from each parish council	£0
2. any funds not yet recovered from each parish council at the end of the reported year	£0
The total amount of—	
CIL receipts for the reported year retained at the end of the reported year other than those to which regulation 59E or 59F applied	£0
CIL receipts from previous years retained at the end of the reported year other than those to which regulation 59E or 59F applied	£0
CIL receipts for the reported year to which regulation 59E or 59F applied retained at the end of the reported year	£0
CIL receipts from previous years to which regulation 59E or 59F applied retained at the end of the reported year	£0

Table 3: Community infrastructure levy reporting

5. Local plan policy monitoring

Background and context

- 5.1. This section of the monitoring report considers the performance of the [Bexley Local Plan](#) policies against a set of monitoring indicators. The indicators are grouped by theme, and are considered together where they are closely related.
- 5.2. It is important to ensure a robust monitoring process is in place for the Bexley Local Plan for many reasons, including to:
- fulfil the Council's statutory obligations as a local planning authority
 - evaluate the effectiveness of planning policy and decision making
 - inform future decision making within the development management and planning policy teams, as well as across Council departments
 - inform, and be informed by, spatial objectives set out in the Council's key plans and strategies
 - ensure the objectives set out in the local plan and integrated impact assessment are being met, or are on track to be met within the plan period
 - gather evidence for future reviews of planning policy
 - help communities understand the purpose and effects of planning in their area
 - identify any immediate interventions that need to be put in place to address specific issues or shortfalls
- 5.3. The monitoring of the policies within the Bexley Local Plan is based largely on a framework of monitoring indicators set out in Annex A of the document. The monitoring indicators were reviewed and amended as part of the integrated impact assessment (IIA) of the Bexley Local Plan, to ensure that environmental effects are given full consideration alongside social and economic factors. The indicators are considered to align with the IIA objectives, and therefore, as noted in the [IIA post adoption statement](#), provide the basis for monitoring to meet the requirements of the SEA regulations.
- 5.4. The framework attempts to measure and monitor the effectiveness of the Bexley Local Plan as a whole rather than each individual policy, as this would not recognise the complexity of planning decisions, which are based on a range of policies. This would also raise considerable challenges in setting meaningful indicators for which reliable data would be available. However, most policies do have relevant indicators, and the indicators taken together will provide a detailed picture of how the plan is performing across multiple years, and how it is contributing to good growth in Bexley. Minor amendments to the indicators to improve clarity, along with a number of additional indicators, have been incorporated into the final monitoring framework to ensure that monitoring is feasible and effective over the entire plan period.

Bexley's growth: delivering more sustainable communities

- 5.5. The Bexley Local Plan sets out the Council's approach to sustainable development in the borough, to ensure that growth is well-planned, brings with it benefits for all and provides for a sustainable future. It provides a framework for shaping Bexley's communities and guiding future development over the period to 2038, in line with the principles set out in the [Bexley Growth Strategy](#). Figure 1 illustrates the updated Local Plan Housing Trajectory, which reflects actual and projected delivery measured against Bexley's housing requirement to the end of the local plan period.

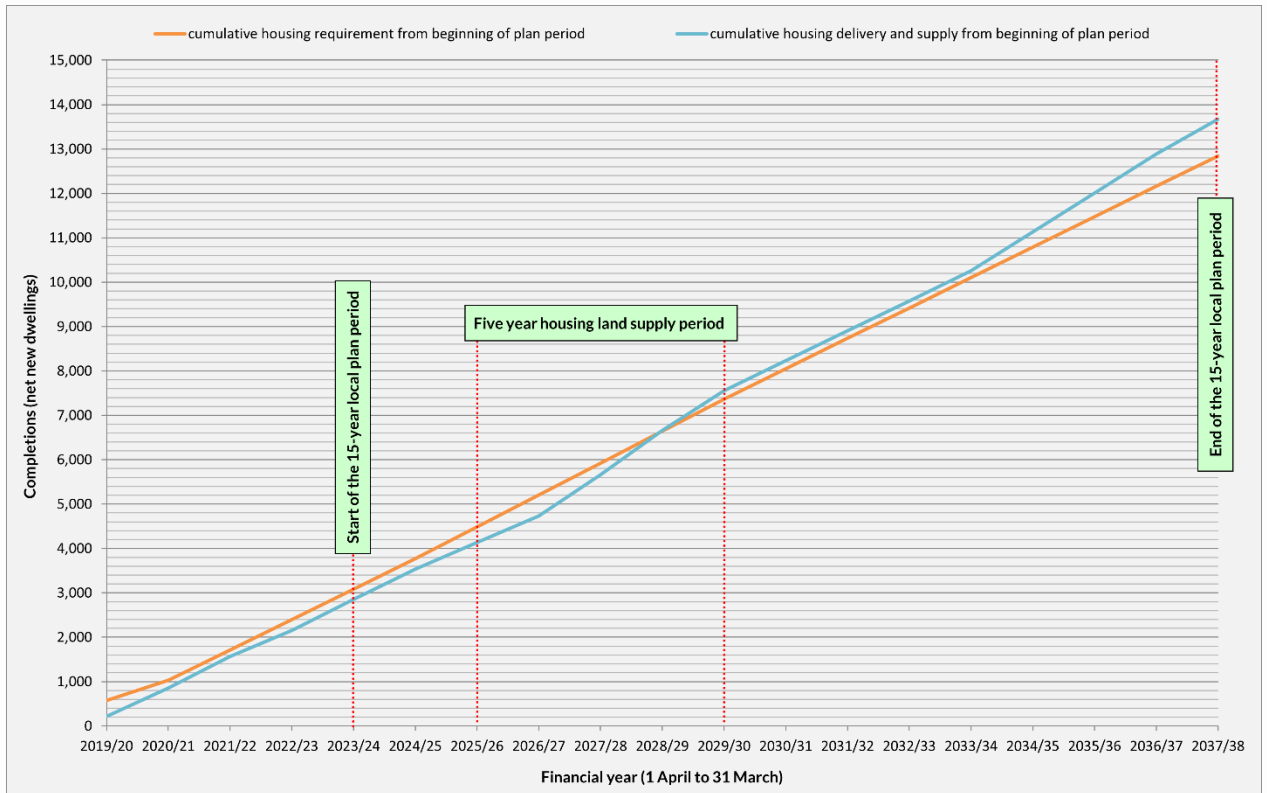


Figure 1: Bexley Local Plan Housing Trajectory (see Annex 1 for further details)

- 5.6. The Council, as local planning authority, determined 2,109 planning applications during the reporting year. A further 341 applications were confirmed by the Council as not requiring a decision. Where a decision was taken, 84% of the applications were approved. 179 of these applications included residential development and for these the approval rate was 100% for major applications (e.g. 10 or more dwellings), 65% for minor developments (between one and nine dwellings), and 69% for changes of use involving residential dwellings. In addition, approvals for residential developments on small sites (e.g. smaller than 0.25 hectares) has seen a modest increase on historic rates.
- 5.7. 80% of dwellings approved in the reporting year fell within the Local Plan's sustainable development locations, which are considered to be the locations where housing and jobs growth should be focused. Similarly, 88% of all approvals with net additional dwellings were on previously developed land, falling just shy of the very ambitious 90% target. Nonetheless, this demonstrates the Council's commitment to a 'brownfield first' approach.
- 5.8. The Council has had a low level of departures from the development plan in its first year of implementation, with only three approvals considered to be departures, all being single dwellings or extensions granted permission in previously developed areas of the Green Belt. This amounts to just 0.17% of all approvals.

LPM-01 Net additional dwellings, conventional and non-conventional

Local plan policies	SP1 Achieving sustainable development – the spatial strategy SP2 Meeting Bexley’s housing requirements DP3 Providing housing for older people
Monitoring target	An average of 685 net additional dwellings per year over the plan period
Performance	700 net additional dwellings completed (102% of annual requirement) 883 net additional dwellings granted planning permission (129% of annual requirement)

- 5.9. Part 1 of Local Plan strategic policy SP2 sets out Bexley’s housing requirement over the plan period. It has been taken from the London Plan, which includes the requirement in the form of a 10-year target (for the period 2019/20 – 2028/29) that is annualised to give a requirement of 685 dwellings per year, on average, for Bexley. Paragraph 2.10 of the Bexley Local Plan demonstrates how this annual target has been rolled over for the remainder of the local plan period (to 2037/38).
- 5.10. The Council is confident that it will achieve an average of 685 new dwellings per year across the entire plan period, as the implementation of the new local plan policies and site allocations for residential development begin to bear fruit. Already the average number of housing completions has increased by 22% compared to performance under Bexley’s previous development plan.

Monitoring period	permissions	completions	target	% of target approved	% of target delivered
2023/24 (current reporting period)	883	700	685	129%	102%
2022/23	891	589	685	130%	86%
2021/22	772	710	685	113%	104%
2020/21	383	640	456	84%	140%
2019/20 (start of plan period)	936	215	571	164%	38%
Total from the start of the plan period	3,865	2,854	3,082	125%	93%

Table 4: Net additional dwellings for the reporting year and from the start of the development plan period

- 5.11. In the reporting year, 700 net additional dwellings were completed and 883 were approved. These figures are in excess of Bexley’s adopted housing requirement of 685 dwellings per year. Cumulatively, from the start of the development plan period (2019/2020) to the close of the monitoring year (2023/2024), housing completions in the borough are at 93% against the requirement, with planning permissions for new housing achieving 125%.

Type	Permissions	Completions
Net additional dwellings, of which :	883	700
– Conventional	799	697
– Non-conventional	84	3
Gross additional dwellings, of which :	986	709
– houses/bungalows (C3 use class)	142	56
– flats/maisonettes (C3 use class)	747	649
– mobile homes	1	1
– large HMOs (SG use class)	22	2
– small HMOs (C4 use class)	21	0
– live/work (SG use class)	31	0
– care homes for older people (C2 use class)	0	0
– supported living (not for older people - C2 use class)	21	1

Table 5: Conventional and non-conventional dwellings in the reporting year

5.12. Table 5 sets out net additional dwellings from permissions and completions, broken down into conventional and non-conventional dwellings. Gross figures are broken down by dwelling type and use class. This illustrates a dominance of the flat/maisonette typology, which is to be expected given the increasing emphasis on the optimisation of development capacity, but also demonstrates a mix of housing types receiving permission including supported living and live/work units.

LPM-02 Delivery of housing on small sites

Local plan policies	SP1 Achieving sustainable development – the spatial strategy SP2 Meeting Bexley’s housing requirements DP1 Providing a supply of housing DP2 Residential development on backland and infill sites
Monitoring target	An average of 305 net additional dwellings per year over the plan period
Performance	Please refer to Table 6

5.13. The London Plan sets, as a component of each London borough’s housing requirement, a target for securing new housing on sites smaller than 0.25 hectares. For Bexley, the supply of housing from small sites should be 45% of the overall housing requirement, equating to 305 dwellings per year. This is a stretching target for Bexley as historically around 28% of Bexley’s housing supply is secured through developments approved on small sites.

5.14. Both the London Plan and Bexley Local Plan take a positive policy approach to residential development of small brownfield sites. In addition, the Bexley Design Guide SPD, currently being prepared, will include specific documents focussing on small sites, and design codes for specific areas. It is expected that a further uplift in high-quality residential developments on small sites will be encouraged when these guidance documents are adopted.

Monitoring period	Permissions (small sites)	Percent of total approvals	Completions (small sites)	Percent of total completions
2023/24 (current reporting period)	248	28%	193	28%
2022/23	299	54%	193	32%
2021/22	361	47%	110	15%
2020/21	280	73%	280	44%
2019/20 (start of plan period)	469	50%	118	61%
Total from the start of the plan period	1,657	47%	894	31%

Table 6: Net additional dwellings on small sites for the reporting year and from the start of the development plan period

5.15. In the reporting year, 28% of both permissions and completions were on small sites, amounting to 193 completions and 248 permissions. When considering the supply of housing from small sites from the start of the development plan period, the percentage from approved residential development is 47%, just above the 45% target. The percentage of completed housing on small sites is 31%; however this increase over the historic rate of 28% is promising given the complexity of delivering housing on small sites.

LPM-03 Percentage of approved dwellings within sustainable development locations

Local plan policies	SP1 Achieving sustainable development – the spatial strategy SP2 Meeting Bexley’s housing requirements DP2 Residential development on backland and infill sites
Monitoring target	No specific monitoring target has been set as development is acceptable outside of sustainable development locations if it is demonstrated to be policy compliant
Performance	80% of approved dwellings are within sustainable development locations as defined in policy SP1 and illustrated on the local plan policies map

- 5.16. The Local Plan’s sustainable development locations are areas within walking distance of Bexley’s town centres and railway stations, other areas with good access to public transport, and designated industrial locations. These locations are considered to be the areas where housing and jobs growth within Bexley should be focussed. Development will be permitted outside of these locations where it is demonstrated to be policy compliant.
- 5.17. 80% of dwellings approved in the reporting year are within the sustainable development locations. Over half of the dwellings approved in this reporting year outside of the sustainable development locations have arisen from the later phases of the development on the former Erith Quarry site, now known as Erith Hills. The initial outline application for this site was approved in 2015, with reserved matters being approved for 91 dwellings in the reporting year. This demonstrates the ongoing efforts to ensure this scheme continues to deliver housing and other benefits, including the completed primary school, as well as public open space and an ecology area.
- 5.18. The remainder of the approved dwellings outside of the sustainable development locations are mostly minor developments for one or two dwellings, representing a much lower level of intensification when compared to approvals within the sustainable development locations.

LPM-04 Percentage of approved dwellings on previously developed land

Local plan policies	SP1 Achieving sustainable development – the spatial strategy DP2 Residential development on backland and infill sites
Monitoring target	90% of planning approvals with net additional dwellings on previously developed land
Performance	88% of planning approvals with net additional dwellings on previously developed land

- 5.19. The planning system gives substantial weight to the development of previously-developed, or ‘brownfield’ land in urban areas, and this approach is reflected in the Bexley Local Plan spatial strategy. Previously developed land is defined in the glossary of the NPPF as ‘land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure,’ going on to make a number of exclusions from previously developed land such as residential gardens, agricultural buildings, allotments and land that was previously developed but where the remains have blended into the landscape
- 5.20. In the reporting year there were a total of 92 permissions granted involving a net gain of dwellings. 88% of these were on previously developed land, with the remaining 12% being on a combination of residential garden land, and designated and non-designated open spaces. Performance falls slightly short of the 90% target for this monitoring indicator; however this is a stretching target that represents a significant increase over the 60% target set in the previous local plan.

LPM-05 Managed release of industrial land to other uses

Local plan policies	SP3 Employment growth, innovation and enterprise DP7 Appropriate uses within designated industrial areas
Monitoring target	Annual update of site allocations on land released from industrial designations by the end of the plan period
Performance	See below for update

5.21. Upon adoption, the Bexley Local Plan released four parcels of designated industrial land (in line with the industrial land strategy) and redesignated this land for residential, or residential-led mixed use development. These four sites form part of the 23 site allocations, set out in Part 2 of the Local Plan. In the reporting year, three of these four site allocations were in the planning system demonstrating good progress towards delivery of this target.

LPM-06 Advertised departures from Bexley’s Development Plan

Local plan policies	SP1 Achieving sustainable development – the spatial strategy
Monitoring target	Fewer than 1% of total permissions granted in reporting year that are considered to be departures from the development plan
Performance	Target met – just 0.17% of the total permissions granted were considered to be departures from the development plan

5.22. Three approvals considered to be departures from the plan have been recorded in the reporting year, amounting to 0.17% of total approvals. Two of these approvals are on a single site, and all three are for demolitions of existing buildings and the erection of single dwellings, or for extensions to existing dwellings, in already developed areas of the Green Belt. A low level of departures from the adopted plan, as seen in the reporting year, indicates that the policies are being applied consistently and when considered as a whole, are not preventing development from coming forward.

LPM-07 Reporting on planning obligations secured through section 106 agreements

Local plan policies	DP1 Providing a supply of housing DP3 Providing for older people SP3 Employment growth, innovation and enterprise SP7 Social and community services and facilities SP8 Green infrastructure including designated Green Belt SP10 Bexley’s transport network SP11 Safeguarding land for transport schemes SP12 Sustainable waste management SP13 Protecting and enhancing water supply and wastewater infrastructure DP29 Water quality, supply and treatment DP32 Flood risk management Site Allocations policies (SA1 to SA23)
Monitoring target	No monitoring target set. Reports on the number and type of planning obligations secured through a s106 agreement from relevant schemes
Performance	63 individual obligations

5.23. This indicator demonstrates the Council’s commitment to ensuring that the impacts of development are mitigated by securing appropriate developer contributions for the infrastructure needed to support it as well as other requirements where necessary. In particular Local Plan Policy SP7 states that the Council will ensure that developers contribute towards the reasonable costs of

new, expanded and/or improved services, facilities and open spaces that will help to provide more sustainable, inclusive and healthier communities.

- 5.24. In total, 63 developer obligations originating from four applications were secured and have been set aside to provide funding for projects involving affordable housing, employment, open spaces, public realm, sustainability and transport. Further information can be found in the [Bexley Infrastructure Funding Statement 2023/2024](#) on the Council's website.

Bexley's homes: promoting mixed and balanced communities

- 5.25. Bexley is an outer London borough typified by predominately privately owned, interwar, low density residential neighbourhoods. As with all London boroughs house prices in Bexley have risen significantly over recent decades and, although remaining relatively low compared to some areas, present affordability issues as averages wages have not kept pace. Bexley Local Plan policies seek to ensure housing provision meets the needs of Bexley's population and that housing types and tenures reflect local circumstances, whilst also contributing to the sustainable growth of London as a whole.
- 5.26. The NPPF requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy. As a result of demographic change, Bexley is experiencing increased demand for homes, decreasing affordability, rising homelessness with its associated need for more temporary accommodation, as well as issues around providing suitable dwellings for particular groups such as families, and the elderly.

LPM-08 Affordable housing secured from qualifying developments

Local plan policies	DP1 Providing a supply of housing
Monitoring target	Minimum total of 35% affordable housing secured from qualifying developments (10 or more dwellings or smaller 100% affordable schemes)
Performance	Planning permissions in the monitoring year secured 35% affordable housing

- 5.27. The Council has achieved its target of 35% affordable housing (gross) from permissions for qualifying developments in the reporting year.
- 5.28. Future monitoring reports will present average affordable completions across the plan period, and will allow the long-term effectiveness of the relevant policies to be properly assessed, levelling out year-on-year fluctuations.

Monitoring period	Percent secured
2023/24 (current reporting period)	35%
2022/23	31%
2021/22	72%
2020/21	6%
2019/20 (start of plan period)	51%
Total affordable housing percentage secured from the start of the plan period	42%

Table 7: Percentage of affordable housing secured from qualifying developments from the start of the plan period

LPM-09 Affordable housing secured by tenure split and dwelling size

Local plan policies	SP2 Meeting Bexley's housing requirements DP1 Providing a supply of housing
Monitoring target	Secure an affordable housing tenure split of 70% low-cost rent and 30% intermediate housing over the plan period with a housing size mix in line with Table 3 of the Bexley Local Plan
Performance	See Tables 8 and 9

5.29. Bexley's affordable housing tenure split and unit size targets are informed by the conclusions of the 2021 Bexley Strategic Housing Market Assessment (SHMA). Requiring a specific mix of housing tenures and sizes encourages the creation of mixed and balanced communities and better meets the needs of Bexley's residents.

Monitoring period	Low-cost rent	London living rent / shared ownership
2023/24 (current reporting period)	50.4%	49.6%
2022/23	46.2%	53.8%
2021/22	70.9%	29.1%
2020/21	100.0%	0.0%
2019/20	49.0%	51.0%
Tenure split by percent from the beginning of the plan period	54.4%	45.6%
Target	70%	30%

Table 8: Affordable housing tenure annual splits (low-cost and intermediate) and the total split from the start of the plan period

5.30. In the reporting year the Council granted permission for more intermediate tenure affordable units than required, and fewer within the low-cost rent tenure, reflecting the viability impacts of low-cost rent. Grant funding was utilised to secure the maximum number of additional affordable units. Without this, there would have been fewer affordable housing dwellings secured overall and these would have been only intermediate tenure products.

5.31. Overall permissions granted since the beginning of the plan period paint a similar picture, with fewer low-cost rent dwellings secured than required. Permission has been granted for a total of 1,005 affordable dwellings over this period, with an overall tenure mix of 54% low-cost rent and 46% intermediate products. Officers continue to push for higher levels of low-cost rent dwellings through discussions with applicants; however, viability constraints are often difficult to overcome in the current, challenging, financial climate and grant funding is heavily relied upon for this type of affordable housing.

Affordable tenure	size	2023/24	2022/23	2021/22	2020/21	2019/20	Total	target
Low-cost rent	1 bedroom	32%	25%	36%	50%	35%	33.6%	18.6%
	2 bedrooms	11%	44%	55%	50%	46%	41.0%	59.3%
	3+ bedrooms	57%	30%	9%	0%	19%	25.4%	22.2%

Affordable tenure	size	2023/24	2022/23	2021/22	2020/21	2019/20	Total	target
Intermediate	1 bedroom	32%	22%	33%	0%	25%	27.3%	12.8%
	2 bedrooms	34%	66%	49%	0%	68%	56.3%	42.7%
	3+ bedrooms	34%	12%	17%	0%	7%	16.4%	44.5%

Table 9: Yearly dwelling size percentage splits for affordable housing and total from the start of the plan period

- 5.32. Regarding the size mix of affordable dwellings, in general over the development plan period, there has been an oversupply of one bedroom dwellings across all affordable tenures, and an undersupply of two bedroom low-cost rent dwellings and three or more bedroom intermediate tenure dwellings.
- 5.33. However, in the reporting year specifically, permission was granted for a much larger proportion of three bedroom affordable dwellings than has been granted in preceding years, which has started to bring the overall affordable dwelling size mix closer to that of the policy requirement. This will be monitored going forward to see if it forms part of a longer term trend.

LPM-10 Dwelling sizes secured in approved developments

Local plan policies	SP2 Meeting Bexley’s housing requirements DP1 Providing a supply of housing
Monitoring target	Overall housing mix in line with Table 3 of the Bexley Local Plan
Performance	See Table 10

- 5.34. As with the dwelling size mix of affordable housing discussed in indicator LPM-09, Bexley’s overall dwelling size mix (for all tenures) percentage split targets are provided in the final column of Table 3 of the Local Plan. This mix is informed by the 2021 Bexley SHMA, which concluded that the need for housing in Bexley is predominantly for family housing of three or more bedrooms.

Size	2023/24	2022/23	2021/22	2020/21	2019/20	Housing mix secured	Housing mix target
1 bed	41.3%	42.2%	54.4%	44.5%	36.7%	43.2%	9.6%
2 bed	34.4%	37.9%	32.4%	32.1%	49.6%	38.4%	39.8%
3+ bed	24.3%	19.9%	13.1%	23.4%	13.7%	18.4%	50.6%

Table 10: Dwelling size mix secured from the start of the plan period measured against the Local Plan target

- 5.35. Whilst the percentage of family housing secured over the plan period for all tenures falls short of the overall target, proportionately more of this is for the affordable housing tenures and the reporting year shows the strongest return for family housing within the current plan period to date.

LPM-11 Overall density of dwellings in approved developments

Local plan policies	SP2 Meeting Bexley’s housing requirements DP1 Providing a supply of housing
Monitoring target	No specific monitoring target
Performance	104 dwellings per hectare

- 5.36. The density of all approved dwellings in the reporting year was 104 dwellings per hectare. However, when considering just major developments (e.g. 10 or more dwellings) the average site

density was 133 dwellings per hectare, which is higher than historic measures where the average site density for major development was 100 dwellings per hectare.

- 5.37. Average density is being monitored for information only, as there is no specific target or policy requirement to achieve specific densities. Instead, Local Plan policy DP1 requires proposals to use the most effective and efficient use of land and the London Plan advocates for a design-led approach to density.
- 5.38. Future monitoring reports will identify trends in density across the plan period. This indicator may be linked, in future, to guidance on appropriate densities in the Design Guide SPD once this has been adopted.

LPM-12 Reporting on the Self-build and Custom Housebuilding Register

Local plan policies	SP2 Meeting Bexley's housing requirements
DP1 Providing a supply of housing	
Monitoring target	No specific monitoring target on the number of individuals and groups added to the register; however there should be a sufficient number of planning permissions granted to meet the statutory duty
Performance	Eleven individuals and groups added to the register with sufficient permissions granted to meet the indicated demand in previous base periods

- 5.39. The [Self-build and Custom Housebuilding Act 2015 \(as amended\)](#) requires local authorities to maintain a self-build and custom housebuilding register in order to understand demand for self-build in their area. The act also places a duty on the Council to grant a sufficient number of permissions to meet the demand indicated by the number of entries on the register, within three years of the end of each relevant 'base period' (12 month periods starting on 31 October and ending on 30 October each year).
- 5.40. Demand for self-build plots is indicated by the number of entries added to the register in the current base period, plus the total number of entries in the past three base periods, plus any entries from previous base periods for which the demand was not met within the three years.
- 5.41. In the reporting year a further 11 individuals and groups have been added to the register, bringing the total demand indicated by the register to 70 plots.
- 5.42. As of the end of the reporting year the Council is required to have granted sufficient permissions to meet the demand indicated by the register up to the end of base period 5 (30 October 2020). The Council has granted sufficient permissions to meet this demand.

LPM-13 Reporting on gypsy and traveller accommodation

Local plan policies	SP2 Meeting Bexley's housing requirements
	DP4 Gypsy and traveller accommodation
Monitoring target	Four additional pitches over the plan period
Performance	One (net) additional pitch

- 5.43. There are three safeguarded traveller sites in the borough and these are shown on the Local Plan Policies Map. One of these is a socially rented site that is Council managed. There was a total of 25 pitches on these sites at the end of the reporting year. The Council is currently exploring options for the extension and reconfiguration of the Council-managed site.
- 5.44. The Government's bi-annual [Traveller caravan count](#) took place twice during the reporting year in July 2023 and January 2024. This count identified 31 and 45 caravans respectively in Bexley. This

includes caravans on small pitches with permanent planning permission that are not on one of the three safeguarded sites.

- 5.45. The [2021 Bexley Gypsy, Traveller and Travelling Showperson Accommodation Assessment](#) identifies need over the plan period for pitches and notes that the need can be met on both safeguarded sites or through individual planning approvals for small sites to help meet the needs of individual families. In the reporting year, there were three planning permissions granted involving mobile homes that resulted in a net total of one addition:
- loss of a mobile home to facilitate the erection of a permanent single storey dwelling
 - retrospective approval for a plot containing one mobile home, two tourers and a utility room
 - retention of a single storey permanent dwelling and ancillary mobile home.

LPM-14 Securing appropriate standards for HMOs and live/work units

Local plan policies	SP2 Meeting Bexley’s housing requirements DP5 Requirements for HMOs and live/work units
Monitoring target	100% of approvals where appropriate standards have been secured
Performance	Target met - 100% of approvals secured appropriate standards

- 5.46. HMOs (houses in multiple occupation) are homes occupied by more than three unrelated individuals who share basic amenities such as a kitchen and bathroom. They are a source of lower cost housing in the private rented sector, but a large number of them clustered in one area can have adverse impacts on local amenity and on the mix and balance of the local community.
- 5.47. On 24 September 2017, a borough-wide Article 4 Direction came into force, removing the permitted development right that allowed conventional housing to be converted into small HMOs (to be occupied by three to six unrelated individuals) without planning permission. This type of development now requires planning permission, which allows officers to consider the quality and standards of each small HMO application and refuse them where they are not of the appropriate quality, or where they would have an adverse impact on the local area.
- 5.48. There are no permitted development rights for large HMOs (to be occupied by more than six unrelated individuals), meaning that the conversion of a house to a large HMO also requires planning permission.

Planning decision	Small HMOs (C4 use class)	Large HMOs (SG use class)	Total
Applications approved	19 (68%)	5 (100%)	24 (73%)
Applications refused	9 (32%)	0 (0%)	9 (27%)
Appeals allowed	0	1	1
Appeals dismissed	1	0	1

Table 11: Planning approvals for houses in multiple occupation in the reporting year

- 5.49. The Article 4 Direction has been effective in allowing the Council to refuse applications for HMOs where they would not offer quality accommodation for their future occupiers, and where it is considered they would have an adverse impact on their local area. The Council therefore refused nine applications for small HMOs in the reporting year and approved 19.
- 5.50. All five applications for large HMOs in the reporting year were approved, and one was approved at appeal following a refusal in a previous year.

- 5.51. Policy DP5 also places requirements on live/work units to meet the living and space standards that would otherwise be applied to conventional residential accommodation. A live/work unit consists of a hybrid commercial and residential unit occupied by the same individual.
- 5.52. In the reporting year, a single live/work scheme was granted planning permission, with a total of 31 live/work units which were considered to meet all relevant living and space standards.

LPM-15 Net loss of housing from planning approvals

Local plan policies	DP6 Loss of existing housing
Monitoring target	No net loss of housing from approved developments, including HMOs of a reasonable standard, unless criteria are met
Performance	No net loss of housing that does not fall under the criteria of policy DP6

- 5.53. Schemes involving a net loss of housing will compromise the Council’s ability to meet its overall housing need. Local Plan policy DP6 provides very limited criteria where the net loss of housing would be considered acceptable. In the reporting year two schemes were granted planning permission that involved a net loss of housing but that met the criteria of policy DP6.
- 5.54. The first involved the change of use from a mixed-use residential and day nursery to a day nursery only, leading to the loss of a single dwelling. The second involved the conversion of four flats into three five-bedroom HMOs in Welling town centre. It was considered that the proposal would allow improvements to be made to the residential amenity of the existing units and would not result in an overconcentration of HMOs in the area.

Type of loss of conventional housing	Existing conventional dwellings	Proposed non-conventional dwellings	Net gain in dwellings
Conversion to small HMO	17	16	-1
Conversion to large HMO	5	16	11
Conversion to supported living accommodation	9	13	4
Conversion to non-residential use	1	0	-1
Conventional housing scheme involving a net loss	0	0	0
Total	32	44	12

Table 12: Loss of conventional housing in the reporting year

- 5.55. The loss of conventional dwellings to other types of housing is monitored for information purposes as these schemes do not result in a net loss of housing (with the exception of the schemes discussed in the paragraphs above).
- 5.56. When monitoring the net gain/loss of non-self-contained/communal housing, the Council follows the London Plan approach, which is based on the amount of conventional housing this form of supply is expected to free up, based on census data. Care homes for older people are counted as each bedroom being equivalent to a single home, student accommodation is counted as 2.5 bedrooms equalling one dwelling, and all other non-self-contained communal accommodation (including large HMOs) is counted as each 1.8 bedrooms being equivalent to a single dwelling.
- 5.57. In the reporting year there was a loss of 32 dwellings that would be considered conventional housing. These were in total converted into 44 units of non-conventional housing, a net gain of 12.

Most of the loss of conventional dwellings can be attributed to conversion to small HMOs. As discussed for indicator LPM-14, HMOs play a role in providing lower cost housing in the private rented sector.

- 5.58. Whilst this amounts to only a small percentage of the overall conventional dwelling stock, and is more than replaced by approvals for new-build conventional dwellings, it should be noted that HMO conversions are often only possible for larger homes and will therefore disproportionately affect the supply of family housing. The longer-term impacts of this will continue to be monitored closely in future reports.

LPM-16 Reporting on the Council's housing waiting list

Local plan policies	Not directly linked to specific policies but provides context
Monitoring target	No specific monitoring target
Performance	1,479 households on the housing waiting list

- 5.59. As of 31 March 2024, there were 1,479 households on Bexley's housing waiting list. This is a net increase of 268 households from 31 March 2023.

LPM-17 Average house price in Bexley

Local plan policies	Not directly linked to specific policies but provides context
Monitoring target	No specific monitoring target
Performance	Average house price of £425,000 and house price to workplace-based earnings ratio of 11.53

- 5.60. This indicator is being monitored for information only. Changes in average house prices and the house price to earnings ratio provides useful context in relation to the standard methodology for calculating housing need. The house price to earnings ratio provides a helpful indication of relative affordability of housing in an area.
- 5.61. The average house price in Bexley as of September 2023 (data is published every March for the previous September) was £425,000. This represents an increase of £10,000 over the year, slightly higher in percentage terms to the increase seen across London as a whole (a 2.4% vs 1.0% increase, respectively).
- 5.62. Over the year, wage growth outperformed the growth in house prices leading to a slight improvement in the house price to workplace-based earnings ratio, which decreased by 2.9% from 11.86 to 11.53. For context, this is similar to the London-wide ratio (11.95), lower than the ratio for Royal Borough of Greenwich (13.28), and higher than the ratio for Dartford Borough (9.68).

Bexley's economy: strengthening our prosperity

- 5.63. Bexley has an established industrial land base, and a relatively well-performing town centre network. Local Plan policies support the continued prosperity and development of these employment locations. It is essential that enough employment land is set aside to accommodate job growth. There is a need to stimulate land-use intensification in employment locations and in and around town centres. This ensures the most viable and sustainable areas remain the focus for future economic development.
- 5.64. The vitality and viability of the borough's town and neighbourhood centres will not just rely on growth; it will also depend upon adapting easily to changes in national retail and leisure trends.

Policies in this chapter set out a more flexible approach to uses in town centres to ensure they remain strong and successful over the plan period.

LPM-18 Approvals for net additional square meters of floorspace for industrial uses

Local plan policies	SP3 Employment growth, innovation and enterprise DP7 Appropriate uses within designated industrial areas
Monitoring target	147,210m ² of net additional floor space on designated industrial sites to meet the planned growth in jobs for employment sectors (B2, B8 and industrial sui generis uses) by the end of the plan period
Performance	298m ² of net additional floor space approved in the monitoring year

5.65. The Bexley Local Plan sets out the amount of growth in jobs over the plan period and identifies the amount of floor space required for employment sector jobs considered appropriate within designated industrial locations. This equates to an additional 147,000m² of net additional floor space needed over the plan period to meet growth.

5.66. In the reporting year, 298m² of net additional floor space was approved. Whilst this is relatively low, it is part of a healthy development pipeline as can be seen from indicator LPM-19 below.

LPM-19 Development pipeline for industrial floor space

Local plan policies	SP3 Employment growth, innovation and enterprise DP7 Appropriate uses within designated industrial areas
Monitoring target	No specific monitoring target has been set
Performance	'Live' schemes currently in the pipeline (e.g. with extant permission or under construction) creating 88,821m ² of net additional floor space for employment sectors on designated industrial sites

5.67. As noted above, 147,000m² of net additional floor space is needed to accommodate the growth in employment sector jobs (use class B2 and B8) over the plan period. The current pipeline of development provides 60% of the total requirement suggesting that Bexley is well placed to achieve its target.

LPM-20 Area of land allocated for industrial use taken up for development

Local plan policies	SP3 Employment growth, innovation and enterprise DP7 Appropriate uses within designated industrial areas
Monitoring target	Intensify designated industrial land over the plan period
Performance	1.53 hectares of land taken up for development in the monitoring year

5.68. The hectares of industrial land identified here are for the applications monitored in LPM-18 that are providing a total of 9,441m² of employment sector (e.g. B2, B8 and industrial sui generis uses) floor space (gross). When considering the amount of floor space gained through redevelopment, the average site density is 61.7 FAR (floor area ratio), which exceeds the minimum density of 54.9 FAR needed to meet the employment growth requirements set out in the Local Plan.

LPM-21 Major retail approvals fulfilling the sequential 'town centre first' approach

Local plan policies	SP4 Supporting successful town centres
Monitoring target	100% (by floor space) of all main town centre uses approved inside of town centre boundaries
Performance	No major main town centre use applications determined in the reporting year

5.69. Within the reporting year there were no major approvals (more than 1,000m² floor space of retail or other 'main town centre uses', or site size larger than 1ha) in Bexley. It is therefore not possible to measure performance against this indicator in this reporting year.

LPM-22 Vacancy rates in major, district and local town centres

Local plan policies	SP4 Supporting successful town centres DP9 Development within town centres
Monitoring target	A maximum of 10% of units vacant in a single centre, and across all centres
Performance	11 out of 13 individual town centres under 10% with an average of 6.5% across all town centres

5.70. Bexley has 13 main town centres which are surveyed for vacancies and changes of use twice a year. Vacancy rates are calculated using 'assigned units' rather than number of occupiers. This involves counting a shopfront of between 5 and 10 metres as a single unit, and anything below or above this is calculated proportionately (i.e. a shopfront with a width of 12m is considered two units). Therefore, the larger impact on the vitality of a town centre from vacancies of larger units is given greater weight.

5.71. A vacancy rate of less than 10% is considered an important indicator as to the overall health and vitality of a town centre. Successful town centres provide important facilities and services to residents, as well as other benefits including improved health outcomes, employment opportunities and community cohesion.

Town centre	Spring 2023 survey	Autumn 2023 survey	Spring 2024 survey
Bexleyheath	3.2%	3.2%	8.3%
Crayford	1.3%	1.1%	1.1%
Erith	18.3%	20.3%	19.0%
Lower Belvedere	4.7%	0.8%	0.8%
Sidcup	10.7%	10.7%	5.7%
Welling	7.2%	5.2%	6.0%
Abbey Wood Village	0.0%	2.9%	0.0%
Bexley Village	4.6%	5.1%	2.9%
Bexleyheath Station	11.2%	8.3%	11.8%
Blackfen	1.0%	5.0%	2.0%
Northumberland Heath	0.0%	0.0%	0.0%
Sidcup Station	10.7%	10.7%	5.7%
Upper Belvedere	11.4%	9.0%	9.6%

Table 13: Town centre vacancy rates since the start of the plan period

5.72. Vacancy rates across most town centres (when surveyed) had improved or remained stable across the reporting year. Five out of the 13 designated town centres were above the 10% vacancy target at the start of the reporting year and this decreased to two out of the 13 by the end of the year.

5.73. Bexleyheath town centre saw a significant increase in vacancies in Spring 2024, however this is due to the timing of the completion of the redevelopment of the Former Civic Offices site which

includes several new small commercial units on the ground floors. These have been completed but are not yet occupied, so have been recorded as vacant in the reporting year. It is understood that some of these units have been successfully let since the Spring 2024 surveys, so this is expected to improve in the next reporting year.

- 5.74. Whilst vacancy rates within Erith town centre, at 19%, are higher than any other town centre in the borough and greater than the national average, the town centre remains an important retail destination for its local population. The Council is actively working to regenerate this town centre, and the retention of commercial floor space is paramount to achieving this ambition.
- 5.75. Town centres with particularly low vacancy rates, indicating good health, include Crayford, Lower Belvedere, Abbey Wood Village and Northumberland Heath, which have all fallen below 2% in the reporting year.

LPM-23 Percentage of E class uses within town centre boundaries

Local plan policies	SP4 Supporting successful town centres DP9 Development within town centres
Monitoring target	A significant percentage of units within town centres falling within Use Class E overall and per individual centre
Performance	Average of 78.6% across all town centres (see Table 14 for individual centres)

- 5.76. Class E of the [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#) is very broad and includes all commercial, business and service uses. The Council’s town centre boundaries encompass areas where commercial, business and service uses are concentrated, and it is considered that a high proportion of Class E uses within a town centre is indicative of a healthy and successful centre.

Town centre	Spring 2023 survey	Autumn 2023 survey	Spring 2024 survey
Bexleyheath	75.0%	75.2%	76.7%
Crayford	75.0%	76.3%	75.6%
Erith	79.7%	79.7%	81.3%
Lower Belvedere	93.7%	92.9%	98.4%
Sidcup	81.7%	82.2%	81.1%
Welling	81.4%	82.0%	82.4%
Abbey Wood Village	55.9%	50.0%	44.1%
Bexley Village	77.7%	77.7%	77.7%
Bexleyheath Station	68.6%	69.2%	69.2%
Blackfen	72.1%	72.1%	72.1%
Northumberland Heath	83.5%	83.5%	81.8%
Sidcup Station	83.5%	87.2%	85.1%
Upper Belvedere	73.2%	72.9%	73.5%

Table 14: Percentage of units occupied by E uses in town centres since the start of the plan period

- 5.77. The proportion of Class E uses within Bexley’s town centres has remained high with 11 of the 13 town centres above 70%, and Bexleyheath Station falling just below 70%.

5.78. Abbey Wood Village has a significantly lower proportion of Class E uses compared to other centres. However, this town centre is unique in that it is divided in half along the borough boundary with the Royal Borough of Greenwich. The half of the centre within RB Greenwich contains a significant proportion of the Class E uses, including a large Sainsbury’s supermarket at the northern end of the centre, and the western parade along Wilton Road. When the centre is considered as a whole, a significant proportion of the centre’s uses fall within Class E.

LPM-24 Reporting on harmful uses within town centres

Local plan policies	SP4 Supporting successful town centres DP9 Development within town centres
Monitoring target	Within any individual town centre, a maximum 10% of units occupied by harmful uses (takeaways, betting offices/shops, pay day loan shops, and pawn brokers) collectively and no one of these uses above 5% of units
Performance	10 out of 13 town centres fall below the thresholds for the total percentage of harmful uses, and 9 out of 13 town centres fall below the thresholds for the percentage of individual harmful uses.

5.79. The sui generis uses of takeaways, betting offices/shops, pay day loan shops, and pawn brokers are considered to be harmful to the vitality and viability of town centres and can have a negative impact on people’s health. To prevent a proliferation of these uses within Bexley’s town centres, Local Plan policy DP9 sets thresholds for the percentage of units within a centre that are in use as betting shops, pawnbrokers, payday loan shops, and hot food takeaways, and for these uses collectively. Any further applications for these uses above the thresholds should be refused.

Town centre	Betting shop	Pawnbroker	Payday loan shop	Takeaway	Total
Bexleyheath	0.3%	0.4%	0.1%	1.3%	2.1%
Crayford	1.7%	0.2%	0.0%	5.2%	7.1%
Erith	2.0%	0.0%	0.0%	2.0%	4.0%
Lower Belvedere	0.8%	0.0%	0.0%	3.1%	3.9%
Sidcup	0.5%	0.5%	0.0%	4.6%	5.7%
Welling	0.8%	0.7%	0.0%	5.0%	6.5%
Abbey Wood Village	5.9%	0.0%	0.0%	5.9%	11.8%
Bexley Village	0.6%	0.0%	0.0%	3.4%	4.0%
Bexleyheath Station	3.6%	0.0%	0.0%	8.3%	11.8%
Blackfen	3.0%	0.0%	0.0%	5.0%	8.0%
Northumberland Heath	1.7%	0.0%	0.0%	5.0%	6.6%
Sidcup Station	0.0%	0.0%	0.0%	3.2%	3.2%
Upper Belvedere	2.4%	0.0%	0.0%	8.4%	10.8%

Table 15: Percentage of units occupied by harmful uses within town centres

5.80. There are a very low number of pawnbrokers and payday loan shops within Bexley’s town centres, with most centres not having any of these uses. There are a slightly greater number of betting shops, with every centre except for Sidcup Station having at least one example, but only Abbey Wood Village exceeds the 5% threshold. However, Abbey Wood Village is a very small town

centre in terms of total number of units, therefore a single betting shop alone amounts to more than 5% of all units.

- 5.81. Hot-food takeaways make up the majority of the ‘harmful’ uses within Bexley’s town centres. These make up 4% of all units across all town centres. However, in four town centres the 5% threshold has been exceeded (although once again, the Abbey Wood Village figure of 5.9% amounts to a single unit). Therefore any applications for additional units in these uses should be refused in these centres under policy DP9, thus preventing a further increase in the percentage.

LPM-25 Vacancy rates in neighbourhood centres and small parades

Local plan policies	SP4 Supporting successful town centres DP10 Neighbourhood centres and small parades
Monitoring target	A maximum of 10% of units vacant in a single neighbourhood centre or small parade, and across all centres and parades
Performance	34 out of 43 individual centres and parades under 10% with an average of 6% across all neighbourhood centres and small parades

- 5.82. Neighbourhood centres and small parades provide similar benefits to residents as Bexley’s main town centres; however they play an increased role in providing important every day ‘walk-to’ services and facilities for nearby residents and are often the centre of local communities.

Neighbourhood centre	Autumn 2023 survey	Neighbourhood centre	Autumn 2023 survey
Albany Park Station	0%	Marechal Neil Parade / Main Road	3%
Barnehurst Station	0%	Midfield Parade, Mayplace Road East	7%
Bellegrove Parade	0%	Montpelier Avenue	9%
Blendon Road	0%	Sherwood Park Avenue	6%
Falconwood Parade	5%	Slade Green Station	0%
Foster's Parade	0%	Southmere Village	67%
Halfway Street	3%	St James Way	0%
Hollytree Parade / Foots Cray High Street	0%	The Oval	2%
Lion Road	11%	The Pantiles	0%
Long Lane	0%		

Table 16: Neighbourhood centre vacancy rates

Small parade	Autumn 2023 survey	Small parade	Autumn 2023 survey
Belmont Road / Mill Road	0%	Lime Row	0%
Brampton Road / Long Lane	0%	Lower Road	17%
Brampton Road / Shakespeare Road	0%	Maidstone Road	13%
Bridge Road	0%	Park View Hub	44%
Chieveley Parade	0%	Park View Road / Danson Mead	10%

Small parade	Autumn 2023 survey	Small parade	Autumn 2023 survey
Colyers Lane	0%	Parkside Parade / Northend Road	0%
Dartford Road / Old Bexley Lane	0%	Parsonage Manorway	0%
Days Lane	0%	Pembroke Parade / Alford Road	0%
Erith Road/Bus Garage	0%	Stelling Road	40%
Falconwood Station	0%	Upper Wickham Lane / Queens Road	11%
Hadlow Road	0%	Woolwich Road	0%
Lessness Avenue	18%	Wrotham Road	0%

Table 17: Small parade vacancy rates

- 5.83. The majority of Bexley’s neighbourhood centres and small parades are very healthy in terms of vacancies. Of the 43 centres and parades, 27 have no vacancies and an additional seven have vacancy rates of below 10%. Two neighbourhood centres and seven small parades have vacancy rates above 10%.
- 5.84. Southmere Village has a particularly high level of vacancies; however this entire centre is newly constructed and recently completed, and the units are in the process of being let to their first tenants. This is expected to improve significantly in the next reporting year.
- 5.85. Stelling Road and Park View Hub small parades also have high vacancy rates, however at a total of only four and five units respectively these parades are very small, and as such any vacancies will have a disproportionate impact on the percentages for these locations.

LPM-26 Reporting on harmful uses within neighbourhood centres and small parades

Local plan policies	SP4 Supporting successful town centres DP10 Neighbourhood centres and small parades
Monitoring target	A maximum of one unit or 10% of units (whichever is the greater) occupied by harmful uses (takeaways, betting offices/shops, pay day loan shops, and pawn brokers) collectively across a neighbourhood centre, or a maximum of one unit within any of these uses across a small parade
Performance	11 out of 19 neighbourhood centres are below the policy threshold. 16 out of 24 small parades have one or fewer units occupied by harmful uses.

- 5.86. Certain sui generis uses are considered to be harmful to the vitality and viability of neighbourhood centres and small parades and can have a negative impact on people’s health. To prevent a proliferation of these uses Local Plan policy DP10 sets thresholds for the number or percentage of units within a neighbourhood centre or small parade that are in use as betting shops, pawnbrokers, payday loan shops, or hot food takeaways. Any further applications for these uses above the thresholds should be refused.

Neighbourhood centre	Overall percentage of units occupied by harmful uses	Overall number of units occupied by harmful uses
Albany Park Station	26.9%	7.0

Neighbourhood centre	Overall percentage of units occupied by harmful uses	Overall number of units occupied by harmful uses
Barnehurst Station	10.4%	3.5
Bellegrove Parade	11.1%	2.0
Blendon Road	10.0%	2.0
Falconwood Parade	10.5%	2.0
Foster's Parade	4.5%	0.5
Halfway Street	3.3%	1.0
Hollytree Parade/Foots Cray High Street	4.3%	1.0
Lion Road	5.5%	4.0
Long Lane	18.9%	5.0
Marechal Neil Parade/Main Road	2.5%	0.5
Midfield Parade, Mayplace Road East	13.6%	3.0
Montpelier Avenue	9.1%	1.0
Sherwood Park Avenue	30.3%	5.0
Slade Green Station	12.5%	1.0
Southmere Village	0.0%	0.0
St James Way	14.3%	2.0
The Oval	5.8%	1.5
The Pantiles	5.9%	1.0

Table 18: Percentage of units occupied by harmful uses within neighbourhood centres

Small parades	Betting shop	Pawnbroker	Payday loan shop	Takeaway
Belmont Road / Mill Road	0.0	0.0	0.0	1.0
Brampton Road / Long Lane	0.0	0.0	0.0	1.0
Brampton Road / Shakespeare Road	0.0	0.0	0.0	1.0
Bridge Road	0.0	0.0	0.0	2.0
Chieveley Parade	0.0	0.0	0.0	0.0
Colyers Lane	0.0	0.0	0.0	1.0
Dartford Road / Old Bexley Lane	0.0	0.0	0.0	1.5
Days Lane	0.0	0.0	0.0	0.0
Erith Road / Bus Garage	0.0	0.0	0.0	3.0
Falconwood Station	0.0	0.0	0.0	3.0
Hadlow Road	0.0	0.0	0.0	1.0

Small parades	Betting shop	Pawnbroker	Payday loan shop	Takeaway
Lessness Avenue	0.0	0.0	0.0	0.0
Lime Row	0.0	0.0	0.0	0.0
Lower Road	0.0	0.0	0.0	0.0
Maidstone Road	0.0	0.0	0.0	2.0
Park View Hub	0.0	0.0	0.0	0.0
Park View Road / Danson Mead	0.0	0.0	0.0	2.0
Parkside Parade / Northend Road	0.0	0.0	0.0	2.0
Parsonage Manorway	0.0	0.0	0.0	3.0
Pembroke Parade / Alford Road	0.0	0.0	0.0	1.0
Stelling Road	0.0	0.0	0.0	0.0
Upper Wickham Lane / Queens Road	0.0	0.0	0.0	0.0
Woolwich Road	0.0	0.0	0.0	1.0
Wrotham Road	0.0	0.0	0.0	0.5

Table 19: Number of units occupied by harmful uses within small parades

- 5.87. In general, neighbourhood centres appear to have a greater proportion of harmful uses than town centres. Overall, 10% of units within neighbourhood centres are occupied by harmful uses, compared to 6% across Bexley’s town centres. Given their smaller size, the negative impact on vitality and viability of the neighbourhood centres will be disproportionately large.
- 5.88. There are no examples of betting shops, pawnbrokers, or payday loan shop within Bexley’s small parades. Eight of the 24 small parades contain more than one hot food takeaway, taking them above the policy threshold.
- 5.89. Going forwards, in centres that are exceeding the policy thresholds, it would be expected that any further applications for these uses would be refused under policy DP10. Therefore the percentages should not increase further.

LPM-27 New or upgraded telecommunications and associated equipment

Local plan policies	DP8 Telecommunications and digital infrastructure
Monitoring target	No specific monitoring target set for approvals for any new or upgraded telecommunications and associated equipment
Performance	39 applications considered to fall within the relevant permitted development rights, and three applications refused

- 5.90. A total of 42 applications for telecoms equipment were decided within the reporting year. All of these fell within existing permitted development rights, giving the council very limited control over them. However, three applications were refused on the grounds of their impact on the character and appearance of the local area.
- 5.91. Applications vary from the replacement or upgrade of equipment on existing monopoles and towers, to the erection of new monopoles and towers between nine and 25m high. The three applications refused were for monopoles of 16-20m in height, in built up residential areas.

Bexley’s character: reflecting our diversity and heritage through high-quality design

5.92. Bexley is characterised by a number of specific features worthy of protection and enhancement, including its heritage and areas of family friendly housing. Local Plan policies seek to both protect these features whilst ensuring that development opportunities that make the most of the borough’s character and its heritage assets can come forward.

LPM-28 Ensuring large developments are not piecemeal in nature

Local plan policies	SP5 Placemaking through good design
Monitoring target	No specific monitoring target
Performance	See paragraphs below for information

5.93. Where larger developments are phased, compliance with policy SP5 can be demonstrated through the submission of an appropriate master plan of a whole site illustrating how the phases work together to achieve the stated design objectives.

5.94. The Council granted approval for one relevant scheme in the reporting year (proposing either 150 or more new homes or 15,000m² or greater of non-residential floorspace). The proposed development is on the former Electrobases site in Crayford, which will come forward in three construction phases, built-out from east to west across the site. This will result in development that is not piecemeal in nature and that takes a unified approach to the whole site.

LPM-29 Approvals contrary to designing out crime officer advice

Local plan policies	DP11 Achieving high-quality design
Monitoring target	No approvals contrary to the advice of the designing out crime officer
Performance	See paragraphs below for information

5.95. The Metropolitan Police employ specific designing out crime officers who are consulted on a wide range of planning applications. These officers promote the implementation of the ‘Secured by Design’ initiative which aims to prevent crime through environmental design. Their responses are material considerations when making planning decisions.

5.96. The Council ensures that designing out crime officers are consulted on all relevant applications. Their advice is fed back to applicants and regularly leads to scheme amendments.

LPM-30 Approvals for developments with tall buildings

Local plan policies	DP12 Tall buildings and building heights
Monitoring target	No approvals for tall buildings that exceed the maximum appropriate building height for the area
Performance	One approval was issued for a site where the height of buildings exceeded the maximum building height for the area

5.97. There is a need to use land efficiently and to its full potential to provide more homes. This requires an increase in development density in sustainable locations across the borough. Bexley is currently a borough of relatively low density development and few tall buildings (when compared to other parts of London). Appropriate building heights have been set across the borough along with suitable locations for tall buildings in and around the town centres of Abbey Wood Village and Lower Belvedere. Building heights for the rest of the borough are identified as not normally being more than eight storeys in sustainable development locations, strategic industrial locations and

opportunity areas, and four storeys elsewhere. This indicator measures building height compliance with the policy and development proposals are responding appropriately, with all but one approval complying with the requirements of policy DP12.

- 5.98. The Erith Hills development, on the former Erith Quarry, has been being built out for a number of years. It was granted outline consent under previous development plan policies, including the site being allocated in the plan for residential led mixed use development. The approval in the reporting year for detailed matters slightly exceeds what would normally be the maximum building height for areas outside of sustainable development locations. It is not however considered to be inappropriate for this development site, which is a large site separated from its immediate context by landscape buffers.

LPM-31 Approvals for developments located within local protected views

Local plan policies	DP13 Protecting local views
Monitoring target	No approvals that would cause harm to the protected view
Performance	Target met

- 5.99. Policy HC3 of the London Plan requires London boroughs to identify locally significant views within their Local Plans, and to set out what it is about these views that is significant. The [Locally Significant Views Technical Paper](#) describes the views that the Council has identified as possessing sufficient architectural, townscape, landscape or environmental quality to be designated as Local Protected Views. The views are indicated on the Policies Map accompanying the Local Plan. This indicator measures the impact that a development may have upon a protected view.
- 5.100. In the reporting year two planning approvals have been issued that are located within protected views. One approval related to the conversion of an existing first floor to a residential flat. As the application related to a conversion, there was no impact upon the protected local view. The other approval related to the erection of a two storey dwelling. Given the modest scale of the development and its location within an existing urban area (close to Sidcup town centre), the development did not have the potential to impact upon one of the protected views.

LPM-32 Protecting listed buildings and their settings

Local plan policies	SP6 Managing Bexley's heritage assets DP14 Development affecting a heritage asset
Monitoring target	No approvals resulting in the loss of a listed building or harm to its setting
Performance	Target met

- 5.101. Bexley currently has over 150 buildings and structures included on the National Heritage List for England (NHLE). Section 66 of the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#) requires that when considering a planning application for development that affects a listed building or its setting, the planning authority should have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest that it possesses.
- 5.102. The conservation officer was consulted on 16 applications within the reporting year relevant to listed buildings and no approvals were issued that would result in the loss of a listed building, or that would be considered to harm its setting.

LPM-33 Protecting locally listed buildings and their settings

Local plan policies	SP6 Managing Bexley's heritage assets DP14 Development affecting a heritage asset
Monitoring target	No approvals resulting in the loss of a locally listed building or harm to its setting
Performance	Target met

5.103. Bexley maintains an active local list that comprises over 400 buildings, structures and landscapes that are of local historic value contributing significantly to the character of the borough. Whilst these buildings have no statutory protection, the Council recognises their importance in a local context and seeks their retention.

5.104. The conservation officer was consulted on 12 applications within the reporting year relevant to locally listed buildings and no approvals were issued that would result in the loss of a locally listed building, or that would be considered to harm its setting.

LPM-34 Protecting buildings that contribute to the character of a conservation area

Local plan policies	SP6 Managing Bexley's heritage assets DP14 Development affecting a heritage asset
Monitoring target	No approvals resulting in the loss of a building that contributes to the character of a conservation area
Performance	Target met

5.105. Bexley is home to 23 conservation areas, all of which are designated for their special architectural and/or historic qualities. Section 72 of the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#) requires that, upon assessing potential development within these areas, planning authorities have a duty to determine whether a proposal would preserve or enhance the character and appearance of an area as part of the decision making process.

5.106. The conservation officer was consulted on 44 applications within the reporting year relevant to the loss of buildings in conservation areas and no approvals were issued for the demolition of a building within any of the designated conservation areas during the reporting year.

Bexley's wellbeing: providing community facilities and enhancing our environment

5.107. To support the creation of sustainable, healthy and inclusive communities, the Council has taken into consideration the amount of development proposed, the type of development, its distribution around the borough, and when it is expected to be built. However, directly related to this is the impact new residential development will have on existing social and community infrastructure.

5.108. The Local Plan policies that are monitored in this section focus on ensuring that development in the borough both contributes to the provision of, as well as the protection and enhancement of, community services and facilities, green and blue infrastructure, and the ecology of the borough.

LPM-35 Gain and loss of community floorspace

Local plan policies	SP7 Social and community services and facilities DP9 Development within town centres DP15 Providing and protecting social and community infrastructure
Monitoring target	No net loss of community floor space (Use Class F1, F2, or relevant sui generis)
Performance	No net loss. Approximately 1,637m ² gain in community floor space

- 5.109. This indicator demonstrates the Council’s commitment to ensuring that there is an adequate level of social and community facilities to cater for existing and proposed development. The indicator identifies whether there has been a net loss in community floorspace as defined within Local Plan Policy SP7, which also seeks to develop and safeguard services, facilities and open spaces.
- 5.110. There was no net loss in community floorspace in the monitoring year. In total there was a gain of 1,637m² of social and community infrastructure including cultural venues and facilities. This included the approval of a 140 pupil SEN school in Belvedere and a multi-use community space in Erith town centre.

LPM-36 Percentage of relevant approvals informed by a health impact assessment

Local plan policies	DP16 Health impact assessments
Monitoring target	100% of relevant approvals
Performance	8% of relevant approvals

- 5.111. Health Impact assessments (HIAs) identify any potential negative effects that a development might have on the social, psychological and physical health of the surrounding community and are an important tool in helping new development to contribute towards building healthier communities and reduce health inequalities across the borough.
- 5.112. All major development proposals should be accompanied by an HIA, as well as proposals for a number of specific uses that may impact on the health and wellbeing of residents, both positively (to ensure benefits are maximised) and negatively (to ensure these are mitigated effectively). This requirement for a standalone HIA to accompany specific planning applications, set out in Local Plan policy DP16, is a new concept for many as it is a recommendation but not a requirement in the London Plan.
- 5.113. In the reporting year the Council approved 12 applications that should have been accompanied by an HIA of which only one met the requirement. In determining these applications there will have been information included in other documents addressing health and well-being, in particular in design and access statements. This information was considered and found acceptable by the decision maker.
- 5.114. Nonetheless, a standalone HIA is considered a more effective way of ensuring these issues are appropriately dealt with. The low number of standalone HIAs accompanying relevant applications has, therefore, been identified as an area where better communication with applicants is needed.

LPM-37 Area of publicly accessible open space lost and gained

Local plan policies	SP7 Social and community services and facilities DP15 Providing and protecting social and community infrastructure DP17 Publicly accessible open space
Monitoring target	No net loss of publicly accessible open space
Performance	No net loss

- 5.115. The Bexley Green Infrastructure Study includes an assessment of existing publicly open space across the borough and also identifies areas that are deficient in access and this indicator measures the amount of new publicly accessible open space gained or lost, and improvements in access to publicly accessible open space, from new development.
- 5.116. During the reporting year there were no approvals that resulted in a loss of publicly accessible open space, and one approval that created a gain. In addition, many permitted schemes include

areas of smaller landscaped amenity space. Whilst publicly accessible, these are not included in this monitoring indicator because they are intended to serve the residents of the proposed development rather than the wider area, and would not reduce areas of wider deficiency in access to open space.

- 5.117. In terms of new publicly accessible open space, the development at the former Electrobase site in Crayford proposes new public amenity space, the creation of a riverside walk along the River Cray, and improved public access and enhancements to Crayford Meadows.

LPM-38 Area of designated open space lost due to development approvals

Local plan policies	SP8 Green infrastructure including designated Green Belt
Monitoring target	No loss of designated urban open space from planning approvals
Performance	0.5 hectares of urban open space lost

- 5.118. The Local Plan seeks to protect urban open space to retain its important benefits to health and wellbeing, and its visual amenity, by virtue of its openness, contribution to the wider landscape, and/or by providing breaks in the built-up area.

- 5.119. One small area of urban open space was lost in the reporting year, in connection with a residential development that was part of a wider area of designated urban open space, but was itself classed as previously developed land. The site already benefitted from previous planning permission which established the principle of the development as acceptable, was not publicly accessible, and had been assessed as having limited visual and amenity value.

LPM-39 Percentage of residential approvals accessible to local and small open spaces

Local plan policies	SP8 Green infrastructure including designated Green Belt DP17 Publicly accessible open space DP20 Biodiversity and geodiversity in developments
Monitoring target	Percentage of approved residential developments within 400m of Local Open Space (site size >2ha) or 280m of small local spaces (site size <2ha)
Performance	83% of approvals within an accessible distance to local and small open spaces

- 5.120. Access to high quality open space plays an important role in improving mental health, physical health and wellbeing and forms a key part of the Local Plan vision for sustainable growth. The Green Infrastructure Study includes accessibility standards for new developments. Within the reporting year, 83% of all residential developments approved were recorded as falling within either 400m of a Local Open Space or 280m of a small local open space.

- 5.121. The remaining 17% of approvals that were not located within 400m of local or small open spaces were considered acceptable for several reasons. Either they were large developments that created their own open space; or single family homes that provided gardens, or, in only a few cases, were flats that were within 800m of larger open spaces (such as Danson Park).

LPM-40 Net change in area protected by nature conservation designations

Local plan policies	SP8 Green infrastructure including designated Green Belt SP9 Protecting and enhancing biodiversity and geological assets DP20 Biodiversity and geodiversity in developments
Monitoring target	No loss of areas protected by nature conservation designations
Performance	Approximately 0.8ha of designated sites of importance for nature conservation lost to development

- 5.122. The sites of importance for nature conservation (SINC) designation, known nationally as Local Wildlife Sites, protects and supports conservation, restoration and enhancement of land that provides a significant contribution to the ecology of an area. Local Plan policies SP8 and SP9 demonstrate that the Council will protect and enhance the borough's biodiversity and geodiversity assets through its planning decisions.
- 5.123. Part 2 of Local Plan policy DP20 and London Plan policy G6 set out requirements to ensure development proposals directly or indirectly impacting designated sites carefully consider their approach to development, to protect and enhance these valuable assets, which also provide opportunities for people to connect with the natural environment.
- 5.124. Planning approvals on or adjacent to a designated SINC are monitored because these developments are the most likely to have a direct or indirect impact. The effects from these developments can be both positive and negative. In the reporting year, there were five approvals that included designated SINC. The following provides a summary of these:
- Approval for development on the former Electrobases site resulted in the loss of approximately 0.77ha of the Crayford Meadows SINC and impacted on the River Cray SINC that is adjacent to the development site. The consented scheme includes measures intended to mitigate against and compensate for negative impacts, whilst also delivering biodiversity net gains.
 - Approval for an amendment to consented development at the former Erith Quarry to allow space for a vehicular access ramp resulted in the loss of 0.0115ha of the Erith Quarry and Fraser Road SINC. However, a land swap of 0.0197ha that was previously included in the development footprint created an overall increase the ecology area for the benefit of biodiversity.
 - Approval for a mobile home located within the Queen Mary's Hospital Grounds SINC requires the land to be restored should the site cease to be occupied by the applicant.
 - Approval for industrial redevelopment on Church Manorway that includes part of the Belvedere Dykes SINC within the site boundary provides safeguards to ensure the SINC is not adversely impacted and no encroachment into the SINC will occur as part of the development.
- 5.125. A further four planning approvals on sites that are adjacent to designated SINC are considered to have no direct impact, although this will be assessed as part of the Councils formal SINC review process to determine whether any changes to the status of SINC will result from the completed developments. Enhancement measures, such as a green roofs and nesting bricks have been secured by condition, which should be of benefit to wildlife within the designated sites, helping to increase these sites' ecological resilience.

LPM-41 Approvals securing measurable net gains for biodiversity

Local plan policies	DP20 Biodiversity and geodiversity in developments
Monitoring target	100% of non-exempt approvals securing biodiversity net gain
Performance	No relevant approvals in the reporting year - one approval submitted prior to mandatory biodiversity net gain being introduced secured net gains

- 5.126. Biodiversity net gain became mandatory through Part 6 of the [Environment Act 2021](#) for all planning applications submitted on or after 12 February 2024 (unless subject to an exemption) with all development required to deliver a 10% net gain in biodiversity. There is a statutory biodiversity metric that can be used to quantify habitat by assigning a number of units depending on its type, size and quality, to calculate the percentage gained. Prior to the mandatory

requirement taking affect, Parts 1a and 1b of policy DP20 initiated a requirement for proposals to demonstrate that the completed development would create a net gain for biodiversity.

- 5.127. In the reporting year, no major applications (that were not exempt) were received after the mandatory requirement was introduced. However, of the six major applications in the reporting year that were determined prior to this, one of these included a completed metric calculation to demonstrate how a 10% net gain in biodiversity would be secured. This was the development proposal for the former Electrobases site in Crayford, which secured at least 3.3% terrestrial and at least 10% river habitat net gains through its section 106 agreement.

LPM-42 Approvals achieving the target urban greening factor score

Local plan policies	DP21 Greening of development sites
Monitoring target	100% of relevant schemes achieving the target urban greening factor score
Performance	50% of relevant schemes submitted urban greening factor calculations, with 100% of these achieving the target score

- 5.128. Applications for major developments (e.g. 10 or more dwellings, or 1,000m² or more of non-residential floor space) are required to quantify what urban greening factor (set out in Table 8.2 of the London Plan) score the proposed scheme will achieve. Applications should demonstrate a score of at least 0.4 for major residential schemes and at least 0.3 for major mixed-use or commercial schemes.
- 5.129. Four development proposals triggered the requirement to include an urban greening factor calculation with the planning application and of these two did. One was for the new residential development proposed on the former Electrobases site in Crayford, and the other was for a mixed-use scheme on Fraser Road in Erith. In both cases the score achieved surpassed the target.
- 5.130. The other proposals included detailed landscaping schemes, which were considered acceptable in planning terms and would have likely achieved the target score had this been submitted.

LPM-43 Improvements to air quality at monitoring stations

Local plan policies	SP8 Green infrastructure including designated Green Belt SP10 Bexley's transport network
Monitoring target	Improvement over plan period
Performance	National standards and objectives at all four monitoring locations met

- 5.131. London Borough of Bexley is taking action across its activities to improve local air quality, including through the planning system, road traffic management, and its own fleet. Bexley carries out local air quality monitoring at four locations and produces an [Annual Status report](#). This is produced to meet the requirements of the London Local Air Quality Management (LLAQM) statutory process. The Air Quality Annual Status Report for 2022 provides a detailed overview of air quality in Bexley during the 2022 calendar year and will act as a baseline for the Local Plan period and future monitoring reports will assess performance against this baseline.
- 5.132. The air quality monitoring results show that annual and daily concentrations of particulates (PM₁₀) met the respective national standards and objectives at all four monitoring locations. For nitrogen dioxide (NO₂), the annual and daily national standards and objective was also met at all four of the monitoring locations in the borough. The pollutants sulphur dioxide (SO₂) and particulates (PM_{2.5}) also met the respective national standards and objectives in 2022.

LPM-44 Percentage of approvals meeting the air quality neutral standard for emissions

Local plan policies	SP8 Green infrastructure including designated Green Belt SP10 Bexley’s transport network
Monitoring target	100% of relevant approvals demonstrating that they meet the air quality neutral standard for emissions (based on a rolling average)
Performance	100% of relevant approvals achieved the air quality neutral standard

- 5.133. Bexley in general does not suffer from an air quality issue although continued development and the development of adjacent boroughs, alongside an increase in transport movements and the large amount of traffic that passes through Bexley, means it could have air quality issues in the future (especially in the western parts of Bexley that lie nearer to London) if air quality is not effectively managed now. The Local Plan’s sustainable approach to growth supports the Air Quality Neutral standard set out in the London Plan and London Plan Guidance and encourages development to include measures that would deliver further improvements to air quality.
- 5.134. Air Quality Neutral is a standard for new buildings that are designed to ensure that they do not emit more pollution than existing buildings of the same type. Air quality benchmarks have been set for all developments to ensure that their transport and building emissions do not worsen air quality in London, with a simplified approach taken for minor developments.
- 5.135. The Council’s Environmental Health team is consulted on all major planning applications and confirmed that all new developments in the reporting year achieved air quality neutral standards.

Bexley’s infrastructure: provision and management of resources for good growth

- 5.136. As well as setting out an overall strategy for the pattern, scale and quality of development, local plans should make ‘sufficient provision’ for the infrastructure needed to support this strategy. ‘Sufficient provision’ is considered to be the need for projects that are critical in relation to planned growth set out in local plans and those that are essential to ensure that development is sustainable or otherwise acceptable. Proposals for new development should address these infrastructure requirements in a coordinated manner. Therefore, the performance of the Local Plan policies in this section are assessed accordingly, to ensure that sufficient provision is made for infrastructure for transport, waste management, water supply, wastewater, and minerals and aggregates.

LPM-45 Percentage of approved dwellings with good access to of public transport

Local plan policies	SP10 Bexley’s transport network DP22 Sustainable transport DP24 Impact of new development on the transport network
Monitoring target	100% of approved dwellings within 800m of a railway station or 400m of a bus stop
Performance	99.6% of dwellings approved

- 5.137. Sustainable development locations are partly defined by their proximity to bus stops and train stations. Currently approximately 40% of the population lives within 800 metres of a railway station. Policy DP22 encourages the greater use of public transport and requires that access to sustainable transport is considered as part of the design development process. In the reporting year, three dwellings were approved further than 800m from a train station or 400m from a bus stop, representing just 0.4% of all approved dwellings.

LPM-46 Approvals for key transport infrastructure schemes

Local plan policies	SP11 Safeguarding land for transport schemes
Monitoring target	100%
Performance	See Table 20

5.138. Local Plan policy SP11 identifies a list of key transport infrastructure schemes to be delivered, secured or safeguarded through development proposals. Table 20 below provides a progress update for each of these schemes.

Key transport infrastructure schemes	Progress update
Docklands Light Rail extension to Belvedere via Thamesmead	TfL public consultation on extension of DLR to Thamesmead in 2034 took place February/March 2024. TfL have accepted Bexley's request that the emerging scheme is developed so as not to preclude a further eastwards extension to Belvedere in the future.
Bus Rapid Transit (BRT) route corridor priority measures and related interventions	Crabtree Manorway South application has accommodated a safeguarded route for BRT. As part of the DLR extension consultation in February/March 2024, TfL also announced a bus transit scheme using dedicated infrastructure from Woolwich to Abbey Wood Station, via Thamesmead, to support housing growth before the DLR extension is operational.
South Thames Development Route (A206/A2016) targeted interventions	No update
River Thames crossing between Belvedere and Rainham	No update - identified as likely to be delivered beyond the plan period
Upgrading of Erith Pier to accommodate riverbus services	No update
River Darent north of the A206 Bob Dunn Way cycle/walking crossing	No update
Eastern extension of Crossrail services from Abbey Wood towards Ebbsfleet (C2E)	No update
A206 Thames Road dualling Bob Dunn Way to Crayford Way, including widening Cray Mill Bridge and enlarging Thames Road/Crayford Way roundabout	No update

Table 20: Progress of key transport infrastructure schemes

LPM-47 Number of car free developments approved

Local plan policies	DP23 Parking management DP24 Impact of new development on the transport network
Monitoring target	Number of car free proposals approved
Performance	15 car free residential schemes approved

5.139. Local Plan Policy DP24 encourages proposals that reduce the need to travel and improve access to sustainable modes of transport. Car-free developments can only come forward within parts of the borough that are well connected by public transport or where it is considered that there is no significant impact to the highway or residential amenity. However, Bexley is one of only two

boroughs in London that relies solely on buses and heavy rail for its public transport provision. This lack of choice and relatively low connectivity results in a greater reliance on private vehicles for travel.

- 5.140. Policy DP23 notes that there are still challenges that can lead to higher levels of car dependency even in areas of the borough where public transport accessibility levels are higher given the limited range of options and issues with reliability and resilience. This indicator will play an important part in helping to monitor the impacts of car-free development on the local transport network.
- 5.141. During the reporting year 15 car free residential schemes, providing a total of 36 dwellings, were approved and eight schemes, providing a total of 25 dwellings, were approved without additional parking provision but where existing on-site parking provision was retained. All schemes were for 10 or fewer dwellings.

LPM-48 Number of approvals that exceed maximum parking standards

Local plan policies	DP23 Parking management
Monitoring target	No major applications approved that exceed the maximum parking standards for the area
Performance	Two major approvals exceeding maximum parking standards

- 5.142. In recognition of the fact that Bexley’s travel and public transport links are limited, Local Plan Policy DP23 sets out an approach to parking management that seeks to ensure that residential parking standards in certain circumstances are locally specific and supports the borough’s housing needs. Of the six major applications approved in the reporting year, two slightly exceeded the maximum parking standards for the area. However, in both cases there were specific circumstances that allowed for this – the first being that existing parking spaces were retained from the building’s previous industrial use (the approved scheme was for live/work accommodation) – and the second scheme was a resubmission of a previously approved scheme.

LPM-49 Preventing loss of waste capacity on strategic waste management sites

Local plan policies	SP12 Sustainable waste management
Monitoring target	No net loss of capacity on safeguarded strategic waste management sites
Performance	No relevant applications submitted in the reporting year

- 5.143. Bexley has an important role to play in dealing with London’s waste and has enough operational waste facilities to meet the London Plan waste capacity allocation for the borough. The Council works with the other southeast London boroughs and the City of London to pool its London Plan waste capacity apportionment requirements to make the most efficient use of any surplus capacity. During the reporting year there were no applications submitted that were for the safeguarded strategic waste management sites.

LPM-50 Capacity of new waste management facilities

Local plan policies	DP25 new waste management facilities and extensions and alterations to existing facilities
Monitoring target	100% of approvals for new waste management facilities located within strategic industrial locations
Performance	No relevant approvals during the reporting year

5.144. During the reporting year there were no applications submitted for new waste management facilities, or extensions or alterations to existing waste management facilities, resulting in no new capacity for waste management within the borough.

LPM-51 Addressing waste management in new developments

Local plan policies	DP26 Waste management in new development
Monitoring target	100% of approved new developments included a recycling and waste management strategy and, where relevant, a circular economy statement as part of the planning application
Performance	100% of major applications; 0% of minor applications

5.145. During the reporting year there were 35 approvals for new build developments. Of these, only one approval was for a major new build scheme and supporting documents for waste management accompanied this application. All other approvals were for minor new build schemes and no separate supporting documents relating to waste were submitted.

5.146. For the small development proposals, the information was provided in other documents such as a design and access statement or on plans, which allowed appropriate consideration of the matter in making the decision to approve the proposal. Similar to the HIA requirement in indicator LPM-36, better communication is needed with applicants on the requirement for a standalone waste management strategy.

LPM-52 Amount of municipal waste arising and managed (by type)

Local plan policies	SP12 Sustainable waste management DP26 Waste management in new development
Monitoring target	No monitoring target set. Amount of municipal waste arising and managed (by type) from start of the development plan period provided for context
Performance	102,812 tonnes

5.147. Bexley’s residents continue to achieve one of the highest levels of recycling in the country and the highest in London. During the reporting year, half of Bexley’s household waste was recycled or composted.

Type of waste process	Landfill	Incineration (energy from waste)	Recycled/ composted	Total
Amount in tonnes (percent)	86 (0.08%)	55,065 (54%)	47,661 (46%)	102,812 (100%)

Table 21: Municipal waste managed, by type and amount, in the reporting year

5.148. 102,812 tonnes of municipal waste was managed within the borough during the reporting year. Table 21 provides the breakdown of how this waste was processed during the year, with less than 1% ending up in landfill.

LPM-53 Production of primary land-won aggregates

Local plan policies	DP27 Minerals and aggregates
Monitoring target	No approvals that may lead to the unnecessary sterilisation of minerals. No target (tonnes) for the production of aggregates
Performance	Met. Three approved developments within the Minerals Safeguarding Area that will not lead to unnecessary sterilisation of minerals. No relevant approvals for the production of aggregates

5.149. In the reporting year there were no planning applications for minerals extraction, and there was no production of primary land-won aggregates. Three applications submitted within the Mineral Safeguarding Area were approved. Two were on land that already had existing development that was to be demolished in order to redevelop, and the third was a change of use for an existing building. Therefore, none are considered to cause an unnecessary sterilisation of minerals.

LPM-54 Reporting on development proposals on potentially contaminated land

Local plan policies	DP28 Contaminated land and development and storage of hazardous substances
Monitoring target	100% of proposals on potentially contaminated land that are submitted with a desktop study and site investigation
Performance	Target met

5.150. Where a site is known to have a high risk of contamination from a previous use and isn't already accompanied by a desktop study or site investigation, these will be required by planning condition (16 such conditions were imposed in the reporting year).

5.151. Where an application is already accompanied by a desktop study or site investigation, it will be listed as one of the documents the development must be completed in accordance with in condition 1 (4 such applications in the reporting year).

5.152. Where a site is thought to be less at risk, but where there is potential risk from nearby uses, a precautionary condition is added to require remediation to take place if land contamination is found during the development (33 such conditions were imposed in the reporting year).

LPM-55 Ecological and chemical quality of Bexley's main rivers

Local plan policies	SP13 Protecting and enhancing water supply and wastewater infrastructure DP29 Water quality, supply and treatment
Monitoring target	For information only. The ecological quality of main rivers should have a 'moderate to good' status and the chemical quality of main rivers should have a 'good' status
Performance	status of ecological quality - moderate status of chemical quality - fail

5.153. This indicator is being monitored for information purposes only given the long time-frames involved in improving water quality, often beyond the plan period, and the limited impact of planning policies on the overall quality of Bexley's water bodies.

5.154. The Environment Agency (EA) routinely monitors the ecological and chemical quality of water bodies. The ecological status for surface water bodies is classified as being 'high,' 'good,' 'moderate,' 'poor' or 'bad,' and chemical status is classified as either 'good' or 'fail.'

5.155. For Bexley, the EA has declared a 'moderate' ecological status for all five monitored surface water bodies, with an objective for the Thames to retain moderate status by 2027, and other water bodies to achieve good status by 2027. A chemical status of 'fail' was recorded for all five monitored surface water bodies, with an objective to achieve a good status by 2063.

5.156. River basin management plans (RBMPs) describe the EA's framework used to monitor, protect and improve the quality of waters in river basin districts, and set specific environmental objectives. The RBMPs were last updated by the Environment Agency in 2022, with the next update scheduled for 2027.

Bexley’s climate: adapting to and mitigating the effects of climate change

5.157. The UK is committed to contributing to a global reduction in carbon emissions and there is a requirement for national, regional and local planning policies to help deliver this commitment. The Local Plan policies that are monitored in this section focus on ensuring that proposals for new development in the borough address climate change in a coordinated manner, taking account of the policies already in the NPPF and the London Plan.

LPM-56 Exceeding building regulations standards for reductions in carbon emissions

Local plan policies	DP30 Mitigating climate change
Monitoring target	100% of relevant approvals achieving a minimum of 35% reduction in carbon emissions beyond Part L Building Regulations 2021
Performance	100% of relevant approvals achieved the target

5.158. The Council’s expectation is for all development proposals to maximise potential to achieve zero carbon, or be zero carbon ready, to ensure that buildings can become fully zero-carbon as the electricity grid decarbonises. Local Plan policy DP30 and London Plan policy SI 2 set out the zero carbon targets for developments. The GLA’s Energy Planning Guidance provides information on how to comply with the policy.

5.159. All major developments are required to achieve a minimum 35% on-site carbon reduction over Part L Building Regulations 2021. Residential developments are expected to be able to exceed this, and so an additional benchmark has been set that residential developments should be aiming to achieve above 50%. The benchmarks, set out in the GLA Energy Assessment Guidance 2022, may be updated periodically to include additional building types and to reflect improvements in performance over time.

5.160. In the reporting year all relevant planning approvals achieved a minimum 35% reduction beyond building regulations, with an average reduction of 51%, and a total predicted on-site reduction of 520 tonnes of CO₂ per annum. One approval for a major outline scheme did not provide details of its greenhouse gas emissions, but further details have been secured by condition.

LPM-57 Amount of carbon off-set funding secured in the reporting year

Local plan policies	SP14 Mitigating and adapting to climate change DP30 Mitigating climate change
Monitoring target	No monitoring target. Amount of carbon off-set funding secured in the reporting year
Performance	£843,970 carbon off-set funding secured by S106 agreement

5.161. As discussed in indicator LPM-51, major developments are required to achieve net zero-carbon by following the energy hierarchy. This means that regulated carbon emissions should be reduced on-site so they are as close as possible to zero. Once on-site reductions have been maximised, the residual emissions should be offset via a payment into the Council’s carbon offset fund.

5.162. £843,970 of carbon off-set contributions have been secured in section 106 agreements from four planning consents during the reporting year. Payments will be made to the Council in accordance with the terms of the s106, this will either be prior to commencement or prior to first occupation. These payments will be ring-fenced to implement projects that deliver greenhouse gas reductions in the borough, as stated in policy SP14.

5.163. The actual amount of funding collected may differ from the amount secured at decision stage, for example due to indexation, and will only be collected if the triggers in the s106 agreement are met. Further information can be found in the [Bexley Infrastructure Funding Statement 2023/2024](#) on the Council’s website.

LPM-58 Approvals granted contrary to advice on flooding and water quality grounds

Local plan policies	DP18 Waterfront development and development including, or close to, flood defences DP19 The River Thames and the Thames Policy Area DP29 Water quality, supply and treatment DP32 Flood risk management DP33 Sustainable drainage systems
Monitoring target	No approvals granted contrary to Environment Agency or Lead Local Flood Authority advice
Performance	Target met (where concerns were raised by the Environment Agency or the Lead Local Flood Authority, these were resolved prior to consent being granted)

5.164. The Environment Agency routinely provides advice on planning applications in areas at risk from flooding or that may have negative impacts on water quality. An initial objection was made on the basis of flood risk to three planning applications that were decided in the reporting year. In all cases, the Environment Agency’s advice was followed, and changes were made to the schemes prior to consent being granted.

5.165. The Lead Local Flood Authority (LLFA), which in Bexley’s case is the Council, also provides advice on proposals that involve potential impacts on surface water flood risk. In the reporting year the LLFA raised objections to 14 applications, 11 of which went on to be approved by the Council. On all occasions where an objection was raised, this was resolved before the decision was taken, either through the addition of a condition, requests for further information from developers (that was provided), or through amendments to the schemes.

Overall policy performance and usage

5.166. This section monitors how often particular policies are being used in decision-making, and how these decisions are subsequently performing at appeal.

Refusals

5.167. In total, from the date of adoption of the Bexley Local Plan (26/04/2023) to the end of the reporting year (31/03/2024), 208 applications were refused where a Local Plan policy was cited as a reason for refusal. This does not include, for example, refusals of applications for prior approval or lawful development certificates, which are not determined on the basis of Local Plan policies.

Policy number	Policy	Number of times cited in refusals	Percentage of refusals
DP11	Achieving high quality design	143	84%
SP5	Placemaking through good design	77	45%
DP24	Impact of new development on the transport network	15	9%
DP14	Development affecting a heritage asset	14	8%
DP2	Residential development on backland and infill sites	10	6%
SP6	Managing Bexley’s heritage assets	9	5%

Policy number	Policy	Number of times cited in refusals	Percentage of refusals
SP8	Green infrastructure including designated Green Belt	7	4%
DP23	Parking management	7	4%
DP9	Development within town centres	6	4%
DP22	Sustainable transport	5	3%
DP5	Houses in multiple occupation and live/work units	4	2%
DP32	Flood risk management	4	2%
DP26	Waste management in new development	3	2%
SP1	Achieving sustainable development – the spatial strategy	3	2%
DP8	Telecommunications and digital infrastructure	3	2%
DP15	Providing and protecting social and community infrastructure	2	1%
SP4	Supporting successful town centres	2	1%
SP14	Mitigating and adapting to climate change	2	1%
DP33	Sustainable drainage systems	2	1%
DP6	Loss of existing housing	2	1%
SP10	Bexley’s transport network	2	1%
DP21	Greening of development sites	2	1%
DP13	Protecting local views	1	1%
DP30	Mitigating climate change	1	1%
SP7	Social and community services and facilities	1	1%
DP16	Health impact assessments	1	1%
DP1	Providing a supply of housing	1	1%
SP2	Meeting Bexley’s housing requirements	1	1%
SP12	Sustainable waste management	1	1%

Table 22 Policies cited in refusals

- 5.168. In the reporting year, the two design-related policies (DP11 and SP5) are being utilised far more than any other policies when it comes to refusing applications, being cited in 84% and 45% of refusals, respectively. The next most cited policy is DP24 Impact of new development on the transport network, being cited in 9% of refusals.
- 5.169. This reflects the fact that the majority of applications received in the reporting year are for householder developments where design is likely to be the most important consideration. These policies are also likely to be used in combination with other Local Plan policies, as reasons for refusal.
- 5.170. Looking more generally at Table 22, the most common issues that appear to arise in refusals are design (as discussed), transport issues, harm to heritage assets and green infrastructure, and the impacts of infill development.

Appeals

5.171. Of the 208 refusals discussed above, 12 have been subject to appeal. Three of these have subsequently been allowed on appeal and nine have been dismissed. Six are awaiting appeal decision.

Policy number	Policy	Number of times policy upheld at appeal	Number of times policy not upheld at appeal
DP11	Achieving high quality design	8	3
SP5	Placemaking through good design	4	1
DP24	Impact of new development on the transport network	1	0
DP14	Development affecting a heritage asset	1	0
DP2	Residential development on backland and infill sites	0	1
SP6	Managing Bexley's heritage assets	1	0
SP10	Bexley's transport network	1	0

Table 23 Policy performance at appeal

5.172. Table 23 shows how Local Plan policies have performed at appeal up until the end of the reporting year. Given the limited amount of data that can be gathered from a single reporting year it is difficult to draw conclusions, however it does appear that whilst the design-related policies (DP11 and SP5) are the most used as a basis for refusing applications, they are also the most subjective and therefore the most vulnerable at appeal. However, for the majority of appeal decisions the Council's original decision is being upheld, and there are no policies that are clearly performing more poorly than others.

5.173. Future monitoring reports will continue to update this table with new appeal decisions.

Annex 1: Five year housing land supply

Local plan housing trajectory updated for the monitoring report

A 1. Bexley's Local Plan housing trajectory has been updated with data from the Bexley Local Plan Monitoring Report 2023/2024 (the first complete year following adoption of the Bexley Local Plan) and from local plan site allocations and other large schemes that are now progressing through the planning system. Included in the housing trajectory is the identification of a five year housing supply from 1 April 2025 to 31 March 2030. This annex sets out further details.

Identifying a five year housing land supply from the housing trajectory

A 2. For the purposes of demonstrating a five year housing land supply, this is the five year period following on from the current financial year after the monitoring year – in this case from 1 April 2025 to 31 March 2030. In line with the NPPF, a 5% buffer has been added to the requirement and this total requirement is used to determine the number of years of supply. Annex Table 1 demonstrates a five year housing land supply of 5.6 years measured against Bexley' requirement.

Demonstrating a five year housing land supply	
Five year total identified housing land supply capacity (net dwellings)	4,020
Bexley's housing requirement (685 multiplied by 5 years + 5% NPPF buffer)	3,596
Number of years' supply measured against the housing requirement	5.6 years
Supply as a percentage of the housing requirement (with 5% NPPF buffer)	112%

Annex Table 1: Headline capacity figures (net dwellings) from the five year housing land supply assessment

A 3. The figures in Annex Table 2 below have been extracted from the relevant years of the updated local plan housing trajectory (see Figure 2). Further details are provided in Annex Tables 3 to 7.

Components that make up the five year housing land supply figure (net new homes) Figures extracted from the updated Local Plan Housing Trajectory	Net units
Approved qualifying major development schemes and 100% AH developments (including starts)	1,699
Approved non-qualifying major development schemes (including starts)	240
Approved minor development (schemes with fewer than 10 units) (including starts)	623
Phases of approved schemes pending s106 agreements or any direction from the Mayor programmed to be completed by 2030 in line with the submitted construction timetable	622
Windfall supply (small sites) allowance at 31% of annual requirement	1,062
Submitted schemes anticipated to be approved with partial completions by 2030	306
Pre-applications anticipated to be submitted and approved with partial completions by 2030	104
subtotal	4,655
Development under construction anticipated to be completed during the current fiscal year (2024/2025) removed from five year supply	-635
Total amount of five year housing supply (net new homes) between 2025-2030	4,020

Annex Table 2: Summary of Bexley's five year housing land supply, from 1 April 2025 to 31 March 2030



Annex Figure 1: Updated Local Plan Housing Trajectory

Methodology applied in calculating the housing trajectory

A 4. Updating the housing trajectory provides the opportunity to reflect recent activity in the planning system following on from the adoption of the Bexley Local Plan. The updated housing trajectory for the whole of the plan period (2019/20 to 2037/38) is now calculated at 13,675 (net) new residential units and is made up of the following three main components:

1. **Housing completions** (actuals from the start of the development plan period to the end of the reporting year), from
 - (a) published HDT measurements
 - (b) monitoring data submitted to the government for 2023/2024 and reported in the local plan monitoring report
2. **Housing supply** (actual completions and projections for the current financial year)
3. **Housing supply** to the end of the local plan period, from
 - (a) extant consented schemes, including developments that are under construction
 - (b) approved developments pending section 106 agreements (planning contributions) and any direction by the Mayor of London (where relevant)
 - (c) windfall supply (small sites) allowance at 31% of annual requirement
 - (d) development pipeline (major residential schemes that have been submitted and where the principle of residential development is appropriate)
 - (e) development pipeline (major residential schemes at pre-application stage where the principle of residential development is appropriate)
 - (f) managed land supply from remaining site allocations that have yet to come through the planning system

Details of residential unit figures from the three main components of the housing trajectory

- A 5. Component 1: this looks backwards for actual completions for the reporting year (1 April 2023 to 31 March 2024) and for housing delivery, cumulatively, from the start of the development plan period on 1 April 2019. The actual completions data element of the housing trajectory is sourced as per items 1(a) and 1(b) above equates to **2,851 (net) units**.
- A 6. Component 2: the current fiscal year is a combination of actual completions, verified at 30 September 2024, and projected completions to 31 March 2025. This year has been projected to deliver **685 (net) units**, 50 of which are actual completions from the first six months of the year combined with projected completions for the remaining six months of the year.
- A 7. Component 3: the remainder of the local plan period to 31 March 2038 is a projected pipeline of housing supply of **10,139 (net) units**, and includes as the first five years the required five year housing land supply. The projected completions from component 2 above are removed to avoid double counting. Any permissions that have lapsed at 30 September 2024 have been excluded from the supply.

The projected supply that makes up the Local Plan housing trajectory	
Bexley’s housing requirement to the end of the local plan period (from 1 April 2025 to 31 March 2038), calculated as 685 net new homes per annum (multiplied by 13 years) and including a 5% NPPF buffer of 171 (net) dwellings for the five year housing supply period part of the trajectory	9,076
Projected housing supply, comprised of:	
(a) Extant consented schemes, including developments where construction has started, minus 635 (net) units that are anticipated to be completed during the current fiscal year	1,927
(b) Approved developments pending section 106 agreements (planning contributions) and any direction by the Mayor of London (where relevant)	2,469
(c) Windfall supply (small sites) allowance at 31% of annual requirement for each year (average annual completion rate from start of the plan period)	2,761
(d) Development pipeline – submitted planning applications where the principle of residential development is appropriate (major residential development – 10 or more net new homes)	788
(e) Development pipeline – pre application stage where the principle of residential development is appropriate (major residential development – 10 or more net new homes)	492
(f) Managed supply from the remaining Local Plan site allocations (not yet in the planning system) (note: a further capacity of 1,007 net new homes falls outside the plan period)	1,703
Bexley’s total projected housing land supply for the remaining 13 years of the local plan period	10,139

Annex Table 3: Headline housing supply figures (net dwellings) measured against Bexley’s housing requirement

Detailed tables of the main components of the housing trajectory

- A 8. As identified above, a local planning authority’s housing trajectory, and evidence of a five year housing land supply, is formed of various components. Annex Tables 4 to 7 below provide details of major residential schemes (or the residential components thereof) that are:
 - a. Approved and qualify for contributing to affordable housing and the amount secured;
 - b. Approved but are not required to provide affordable housing;
 - c. Approved major residential schemes that are subject to a s106 agreement and/or any direction from the Mayor of London (where relevant); and
 - d. Submitted into the planning system and are considered to be, in principle, an appropriate development proposal for the land uses of the site.

Annex 1: Five year housing land supply and Local Plan Housing Trajectory update

Status	Planning ref	Local plan site allocation	Approval or start date	Address	Development description (residential component)	Gross units	Net units	AH %
Approved	23/00254/ FULM	ERIO1 Erith Western Gateway	19/04/24	Walnut Tree Depot, Stonewood Road, Erith	Erection of a part five storey, part seven storey building to create 65 residential units	65	65	0
Approved	23/01307/ FULM		19/04/24	176 Slade Green Road, Erith	Construction of a four storey building providing 44 residential units	44	42	0
Approved	20/00775/ OUTM27		05/01/24	Erith Quarry Fraser Road, Erith	Details of Reserved Matters to provide 60 residential units pursuant to planning permission 20/00775/OUTM	60	60	0
Started	22/02447/ FULM		21/12/23	16A St Johns Road, Sidcup	Construction of two, two storey buildings with roof space accommodation providing 16 residential units	16	15	0
Started	20/00775/ OUTM21		06/08/23	Erith Quarry Fraser Road, Erith	Details of Reserved Matters to provide 31 residential dwellings pursuant to planning permission 20/00782/OUTM	31	31	0
Approved	21/03064/ FULM		13/07/23	106 Bexley Road, Erith	Alterations and extensions to existing building to provide 16 residential units	16	15	0
Approved	22/01564/ FULM	CRA01 Former Electrobases Site	28/06/23	Maxim Road, Crayford	Redevelopment of the site to provide 559 residential units	559	559	43%
Started	20/00782/ OUTM01		23/06/23	Erith Quarry Fraser Road, Erith	Details of reserved matters to provide 145 residential units pursuant to planning permission 20/00782/OUTM	145	145	78%

Annex 1: Five year housing land supply and Local Plan Housing Trajectory update

Status	Planning ref	Local plan site allocation	Approval or start date	Address	Development description (residential component)	Gross units	Net units	AH %
Started	21/03340/ FULM		01/04/23	2A Hadlow Road, Sidcup	Redevelopment of site to provide 32 residential units	32	32	0
Started	16/01287/OUTM01		14/03/23	Binsey Walk, Abbey Wood	Details of all reserved matters to provide 329 residential units pursuant to outline planning permission 16/01287/OUTM	329	329	42%
Approved	22/01586/ FULM		03/03/23	Land to the rear of 32-38 Alers Road, Bexleyheath	Development of site to provide 11 residential units	11	11	0
Started	19/02645/ FULM		18/01/23	Land at the junction of Macarthur Close, West Street, Erith	Redevelopment of site to provide 30 residential units	30	30	0
Approved	20/00775/ OUTM10		06/04/22	Erith Quarry Fraser Road, Erith	Details of Reserved Matters to provide 75 residential units pursuant to planning permission 20/00775/OUTM	75	75	24%
Approved	19/00682/ OUTM		09/12/21	48 and Former Allotment Site, Howbury Lane, Slade Green	Redevelopment of site to provide up to 48 affordable housing residential units	48	47	100%
Started	20/00775/ OUTM		11/11/21	Erith Quarry Fraser Road, Erith	Hybrid planning application for the phased development of up to a total of 249 residential units with detailed submission for 83 residential units	83	83	83%

Annex 1: Five year housing land supply and Local Plan Housing Trajectory update

Status	Planning ref	Local plan site allocation	Approval or start date	Address	Development description (residential component)	Gross units	Net units	AH %
Approved	20/02852/ FULM		14/10/21	Former Ye Olde Leather Bottle Site, 131 Heron Hill, Belvedere	Erection of a 3/4 storey building comprising a 70 Bed Care Home, providing 70 residential units	70	70	0
Started	21/01641/ FULM		26/05/21	Former Lamorbey Swimming Centre, 157 Station Road, Sidcup	Redevelopment of site to provide 31 residential units	31	31	0
Started	19/02727/FUL		17/12/21	47, 47A - C, 49 and 49A - C Northend Road, Erith	Redevelopment of site to provide nine residential units	9	5	100%
Started	08/11096/ FULM		12/10/16	Ballast Wharf, 91-101 West Street, Erith	Redevelopment of site to provide 54 residential units	54	54	0
					totals	1,708	1,699	37%

Annex Table 4: Major residential development schemes that qualify to make a contribution to affordable housing

Status	Planning reg	Permission	Address	Development description (residential component)	Gross units	Net units
Approved	24/02163/PRIOR	13/09/24	Roxby House, Station Road, Sidcup	Notification of prior approval for the change of use from offices (Use Class E) to 30 residential units	30	30
Approved	22/02989/ FULM	26/01/24	Fraser House, Fraser Road, Erith	Rearrangement of the existing light industrial Class E(g)(iii) units on the ground floor to form 1 Class E(b) unit and 7 light industrial Class E(g)(iii) units. Formation of 31 live/work units (Sui Generis) by converting the existing upper floors, along with the construction of two additional floors above.	31	31
Approved	23/02244/ PRIORU	15/01/24	105-139 (Block A) & 141-175 (Block B) Wessex Drive, Bexley	Notification for Prior Approval for the construction of an additional storey on the existing flats to provide 12 additional residential units.	49	12

Annex 1: Five year housing land supply and Local Plan Housing Trajectory update

Status	Planning reg	Permission	Address	Development description (residential component)	Gross units	Net units
Allowed	19/03072/ FULM	26/01/23	2, 4, 6 and 8 Danson Road, Bexleyheath	Redevelopment of site to provide a 70 bedroom nursing home.	70	66
Approved	22/00622/ FULM	02/12/22	Europa House, Europa Trading Estate, Fraser Road, Erith	Erection of 3 additional storeys together with alterations to provide 60 live/work units	60	60
Approved	22/00914/ PRIORT	21/07/22	Heather Court, 1 Progressive Close, Maidstone Road, Foots Cray	Prior approval notification for construction of a two storey upward extension to provide 28 residential units	28	28
Approved	21/01485/ PRIORB	11/11/21	West Lodge, Russell Close, Bexleyheath	Application for prior approval of a proposed demolition of buildings and construction of one 3 storey (and basement) residential block of 13 studio units. (Revised proposal to application 21/00589/PRIOR)	13	13
totals					281	240

Annex Table 5: Major residential development schemes that are not required to make an affordable housing contribution

Status	Planning ref	Local plan site allocation	Address	Development description (residential component)	AH %	Gross units	Net units
Approved subject to any direction by London Mayor and S106	21/01948/ OUTEA	ABW02 Lesnes Estate/ Coralline Walk	Land bounded by Harrow Manorway, Yarnton Way, Lensbury Way and Maran Way, Abbey Wood	Outline application (all matters reserved) for the phased redevelopment of the site to provide up to 1,950 residential units	35% affordable by hab room	1,950	1,204
Approved subject to any direction by London Mayor and S106	21/00932/ OUTEA	BEL07 Crabtree Manorway South	Crabtree Manorway South, Belvedere	Outline application (all matters reserved) for the phased redevelopment of the site to provide up to 1,250 residential units	15% affordable by unit	1,250	1,250
Approved subject to S106	23/03120/ FULM		235 and 237 Broadway, Bexleyheath	Redevelopment of the site to provide up to 15 residential units	Affordable housing contribution of £120,219	15	15
totals						3,215	2,469

Annex Table 6: Approvals pending section 106 agreements and any direction by the Mayor of London (where relevant)

Annex 1: Five year housing land supply and Local Plan Housing Trajectory update

Planning ref	Local plan site allocation	Address	Development description (residential component)	Net units
24/01667/ FULM		70 Pier Road, Erith	Construction of a new building attached to existing building to provide 19 residential units	19
23/03414/ FULM	BXH01 Former Bexley CCG Offices	Former Bexley Maternity Hospital site, 221 Erith Road, Barnehurst	Redevelopment of site to provide 117 residential units (35% affordable by unit)	117
23/02922/ FULM	BEL05 Belvedere Gas Holders	Belvedere Holder Station, Yarnnton Way, Belvedere	Redevelopment of the site to provide 392 residential units (10% affordable by unit)	392
22/00576/ FULM		2 Cheviot Close and land to the rear of 4 - 22 Cheviot Close, Bexleyheath, DA7 6SP	Redevelopment of site to provide 29 (28 net) residential units (100% affordable)	28
20/00782/ OUTM07		Former Erith Quarry site (part), Fraser Road, Erith	Details of reserved matters to provide 132 residential units pursuant to planning permission 20/00782/OUTM	132
20/00782/ OUTM06		Former Erith Quarry site (part), Fraser Road, Erith	Details of reserved matters to provide 100 residential units pursuant to planning permission 20/00782/OUTM	100
			totals	788

Annex Table 7: Submitted applications for major residential development currently being considered