AYLESHAM CENTRE PUBLIC INQUIRY

LONDON BOROUHG OF SOUTHWARK:

UPDATED FIVE-YEAR HOUSING LAND SUPPLY CALCULATION

24 October 2025

This document provides the Council's update on its five-year housing land supply in light of the evidence provided in the appellant's rebuttal evidence (Nicholas Alston).

Review of deliverable sites

Council officers have undertaken a detailed review of the schedule of deliverable sites provided by the appellant (Appendix C of rebuttal proof) in light of the definition of "deliverable" in the NPPF glossary and related planning practice guidance (para 007 Reference ID: 68-007-20190722).

The Council acknowledges (but is not in a position to verify) specific market intelligence, including regarding sites in the appellant's control, and accepts that some sites will not be deliverable within the next five years. It is noted that the appellant's Borough Triangle application included documentation indicating first occupation from 2030 but it has been accepted for now that delivery would be beyond five years.

The Council does not accept the appellant's approach in all respects, however. The appellant has omitted sites that are pending a decision or with a resolution to grant permission. Sites with a resolution to grant should be considered deliverable: a resolution confirms the local authority's acceptance of the principle of development and indicates that the site is suitable and available. The absence of a completed s106 agreement is often a procedural matter, not a reflection of viability or intent. Where negotiations are advanced, and there is no evidence of delay or objection, the site should be treated as having a realistic prospect of delivery.

The Council's revised schedule of deliverable sites is attached at Appendix A.

Calculating historical shortfall

The Council disagrees with the assertion that the London Plan (2021) is the relevant adopted plan for calculating housing shortfall in this context. The appropriate adopted development plan is the Southwark Plan, formally adopted in February 2022, which sets out the borough's housing requirement for the period 2020 to 2035. This is in line with the NPPF guidance that states that: "The level of deficit or shortfall will need to be calculated from the base date of the adopted plan."

With April 2020 as the baseline, under-delivery is calculated as follows:

Financial Year	***Total no of homes completed***	***Annual Target***
2020/21	1,109	2,355
2021/22	1,420	2,355
2022/23	2,250	2,355
2023/24	1,588	2,355
2024/25	1,018	2,355
Total	**7,385**	**11,775**
Deficit		**4,390**

Revised five-year housing land supply calculation

The table below summarises the latest position following the Council's own review and should be read alongside the amended schedule of deliverable sites at Appendix A.

Supply input		***Total***	***Formulae***
Annual target As set in the Southwark Plan	A	2,355	As set out in the Southwark Plan
Southwark plan requirement (for next 5 years) Housing requirement	B	11,775	The basic requirement for the next five years (A x 5)
Overall supply of deliverable sites	C	19,543	14,656 homes within site allocations + 2,272 homes from windfalls + 2,615 homes from small sites
Deficit Under/Over supply	D	4,390	See above
5-year housing requirement Including any accrued deficit	E	16,165	(B + D)
Buffer applied As per the last HDT results	F	3,233	E x 20% based on the results of the housing delivery test
5-year housing requirement + accrued deficit + 20% buffer	G	19,398	E+F
Adjusted annual housing requirement	H	3,880	G/5
Overall years' supply	**I**	**5.04**	**(C/H)**

APPENDIX A:
LONDON BOROUGH OF SOUTHWARK: SCHEDULE OF DELIVERABLE HOUSING SITES
24 October 2025

Site			Revised Block 2 Live (years 6-10)						Comments	
Site Reference Number	**Site Address**	**Applictaion Reference**	**2025/26**	**2026/27**	**2027/28**	**2028/2029**	**2029/2030**	**TOTAL: 6-10 Years (2025/26 - 2034/35)**	Appellant's Review	Southwark Council Review
NSP01	Aylesbury Estate, Landed Bounded by Albany Road, Portland Street, Westmoreland Road and Bradenham Close	14/AP/3843	420	261				681		
		17/AP/3885	8					8		
		22/AP/1063		60				60		
	Aylesbury Estate Site Phase 2B Land Bounded By Thurlow Street And Albany Road And Kinglake Street And Bagshot Street	22/AP/2226				640		640	Application is pending determination. Approved by committee (2025). Decision notice not yet issued	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
NSP07	Landmark Court	19/AP/0830	36					36		
NSP12	19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway	23/AP/0479			192			192		
NSP13	Biscuit Factory and Campus	23/AP/2124		1624				1624		
NSP15	Chambers Wharf	07/AP/1262			**384**			384		
NSP16	Conoco House, Quadrant House, Edward Edwards House and Suthring House	20/AP/3250	66					66		
NSP19	Ludgate House and Sampson House, 64 Hopton Street	19/AP/1950	120		120			240		
	Ludgate House and Sampson House, 64 Hopton Street	24/AP/0284			9			9		
	Sampson House	18/AP/1603	170	171				341		
	Sampson House	22/AP/3442			9			9		
	Sampson House	22/AP/3299					2	2		
NSP20	Southwark Overground Station	24/AP/2770				105	110.9	215.9		
	Southwark Station and 1 Joan Street	20/AP/0969	25					25	Pre-commencement conditions discharged Lawful Development Certificate granted (24/AP/1652) August 2024 to confirm the permission has been implemented.	This site is considered deliverable and is included in the five-year housing land supply. All pre-commencement conditions have been discharged, and a Lawful Development Certificate (ref: 24/AP/1652) was granted in August 2024 confirming that the planning permission has been lawfully implemented. These factors demonstrate a clear commitment to progressing the development and provide strong evidence of its deliverability within the relevant timeframe.

NSP22	Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street	23/AP/1854				100	100	200	Permission granted November 2024 NMA (25/AP/0300) currently pending No pre-commencement conditions discharged. Mixed use (mainly office/residential) in 3 buildings of 22-44 storeys.	This site is considered deliverable and is included in the five-year housing land supply. Full planning permission was granted in November 2024, and a non-material amendment (ref: 25/AP/0300) is currently pending, indicating ongoing engagement with the planning process. Although pre-commencement conditions have not yet been discharged, the scale and nature of the proposed development—comprising three mixed-use buildings of 22 to 44 storeys—suggest a significant investment and commitment to delivery. The active pursuit of amendments further supports the likelihood of the scheme coming forward within the relevant timeframe.
NSP25	Burgess Park Business Park: 25-33 Parkhouse Street London Southwark SE5 7TQ	20/AP/0858					109	109	Permission granted for 109 homes - reduced from 128 during the application determination. Pre-commencement conditions discharged Programme Dec 2022-Nov 2024 - Molior suggests this is now pushed to 2027	The site has been updated to reflect the revised scheme, with planning permission granted for 109 homes—reduced from the original 128 during the determination process. All pre-commencement conditions have been discharged, indicating readiness to begin development. Although the original programme anticipated delivery between December 2022 and November 2024, updated market intelligence from Molior suggests this has now shifted to 2027. Nonetheless, the discharge of conditions and continued planning activity demonstrate a clear commitment to delivery, supporting the site's inclusion in the five-year housing land supply.
	35-39 Parkhouse Street London SE5 7TQ	19/AP/2011			85			85	Site does not have planning permission Planning Register states that the application is pending determination. No pre-commencement conditions discharged	Although Section 106 negotiations were initially paused to accommodate changes required under the Building Safety Act, revised plans have now been agreed and will shortly be reviewed by the Chair of the Planning Committee. This demonstrates active engagement and a clear intention to progress the application, providing confidence that the development will come forward within the relevant timeframe.
NSP26	Butterfly Walk and Morrisons Car Park and Police station	19/AP/7057			145			145		
NSP27	Valmar Trading Estate	21/AP/4714		43				43		
NSP34	123 Grove Park	17/AP/4124	9					9		
NSP35	Camberwell Green Magistrates Court	23/AP/2786		144				144	Site does not have planning permission Resolution to grant at planning committee 02 April 2025 Decision Notice not issued. No evidence that homes are deliverable within 5 years	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
NSP36	Denmark Hill Campus East	20/AP/2768					187	187		
NSP40	Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill	19/AP/1867			219			219	Planning permission granted in February 2022. Condition 2 requires development to commence within three years, therefore assume the permission has expired. As confirmed by Cover Letter relating to an NMA (25/AP/2018) (August 2025) planning permission has not been implemented.	Although the original planning permission has technically lapsed, a deed of variation was validated in September 2025, seeking to amend the definition of the 'Demolition Environmental Management Plan' (DEMP) in relation to phasing. The planning agent has indicated that this amendment is necessary due to time constraints and the urgency to commence demolition works. The case officer has confirmed that, under relevant legal provisions, the lodging of a judicial review (JR) extends the life of the permission, which now remains valid until February 2026. In light of these developments, and subject to the approval of the revised DEMP, the site is considered likely to come forward and is therefore regarded as deliverable.
NSP41	Railway Rise, East Dulwich	24/AP/2314			197			197	Site does not have planning permission Resolution to grant at planning committee 02 April 2025 Decision Notice not issued. Programme assumes completion 39 months post decision notice. No evidence of intention to deliver within 5 years	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
		23/AP/0958			45	45		90		

NSP46	6 Avonmouth Street	24/AP/3621					97.2	97.2	Site does not have planning permission. Application pending determination. No evidence to demonstrate deliverable within 5 years	Southwark Council considers this site deliverable and includes it in its five year housing land supply, in accordance with the definition set out in the National Planning Policy Framework (NPPF). The application is scheduled to be considered by the planning committee on 5 November, and this formal progression towards determination provides a clear indication of the site's commitment to delivery.
NSP48	Elephant and Castle Shopping Centre and London College of Communications	16/AP/4458	149	200	200	200	200	949		
		21/AP/1104	4					4		
NSP53	Land between Melior Street, St Thomas Street, Weston Street and Fenning Street	18/AP/0900	362					362		
NSP57	Rich Industrial Estate Crimscott Street And Willow Walk	15/AP/2474			130			130		
	Rich Industrial Estate Crimscott Street And Willow Walk	20/AP/2993			53			53	Site does not have planning permission Resolution to grant at planning committee 02 May 2025 for 183 homes	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
	20 Crimscott Street	19/AP/1286	9					9		
	29-31 Pages Walk, 20-24 Crimscott Street	21/AP/0681				140		140		
NSP59	Southernwood Retail Park 2 Humphrey Street	18/AP/3551	270	271			183	541	PP granted 20/01/2022 for hybrid. Phase 1 (detailed) = 541 dwellings - Assumed deliverable Phase 2 (outline) = 183 dwellings - Reserved matters not yet approved. No evidence of deliverability within 5 years Condition 2 requires phase 1 to commence within 5 years. RM for Phase 2 required within 12 years. No pre-commencement conditions discharged. Programme assumed 2022-2034	The council will include only Phase 1 in the five-year housing land supply, as it remains within its time limits and is required to commence by 20 January 2027 under Condition 2. There is no clear evidence that Phase 1 will not come forward, so it meets the criteria in NPPF Annex 2 for inclusion.
NSP66	49-53 Glengall Road	17/AP/34612	90	91				181		
	Malt Street Regeneration Site Land Bounded By Bianca Road Latona Road Haymerle Road Frensham Street And Malt Street	17/AP/2773	269					269		
	Nyes Wharf Frensham Street	17/AP/4596	77	76				153	Fresh planning application submitted October 2025 (application documentation states that 17/AP/4596 will not be delivered) First completions expected 2030/31	A fresh planning application was submitted in October 2025, demonstrating active engagement and a renewed commitment to development. Although the application documentation confirms that the previous scheme (17/AP/4596) will not be delivered, the submission of a new proposal indicates that the site remains available and suitable for development. While first completions are expected from 2030/31, the planning activity and investment in progressing a revised scheme support its classification as deliverable under NPPF Annex 2, provided there is a realistic prospect of delivery within the five-year period.
	596-608 Old Kent Road Land at Livesey Place	18/AP/3284	93	93	186			372	Commencement confirmed by CoL (25/AP/0413) No demolition works have commenced on site Assume stalled	This site is considered deliverable and remains in the five-year housing land supply. Commencement has been formally confirmed by the local planning authority (ref: 25/AP/0413), indicating that the permission has been lawfully implemented. Although demolition works have not yet begun, the legal start on site demonstrates a clear commitment to development. In line with NPPF Annex 2, this constitutes sufficient evidence to support the site's inclusion, as the absence of visible activity alone does not amount to clear evidence of non-delivery.
	14-22 Ossory Road	19/AP/7610	36	35				71		
	Bianca Warehouse 43 Glengall Road & 1 Bianca Road	20/AP/0039	270					270		
	Horizon Industrial Estate 95 Haymerle Road	20/AP/3822		20	20			40		
	2-10 Ossory Road	21/AP/3246		117				117		
	93 Haymerle Road	23/AP/1294	9					9		

NSP67	310-330 St Jamess Road	21/AP/1667			161			161		
	Wetton House 278 St James Road London Southwark SE1 5JX	24/AP/1168		7				7		
NSP68	Ruby Triangle Site Land Bounded By Old Kent Road Ruby Street And Sandgate Street	18/AP/0897		288	288	576		1152		
	Sandgate Street and Verney Road	18/AP/0196		111				111	Planning permission granted and pre-commencement conditions discharged, works commenced.	Planning permission has been granted, all pre-commencement conditions have been discharged, and a lawful start on site has been confirmed. In accordance with Annex 2 of the National Planning Policy Framework (NPPF), sites with detailed planning permission are considered deliverable unless there is clear evidence that homes will not be delivered within five years. The current pause in visible construction activity does not constitute such evidence. On this basis, the site remains within the five-year housing land supply, with trajectory phasing subject to ongoing review.
	651-657 Old Kent Road London	24/AP/0255			292			292		
	Credon House Verney Road	21/AP/3247			22			22	PP granted 17.01.2023 No pre-commencement conditions discharged. Works have no commenced.	Full planning permission was granted on 17 January 2023, and while pre-commencement conditions have not yet been discharged and construction has not commenced, the permission remains extant and within its valid timeframe. In line with the National Planning Policy Framework (NPPF) Annex 2, sites with detailed planning permission are considered deliverable unless there is clear evidence to the contrary. The absence of physical works does not, in itself, constitute such evidence, and the site continues to show potential for delivery within the five-year period.
	2A Ruby Street	20/AP/1872		1				1	PP granted 03.03.2021	The site has lawfully commenced, demonstrating a clear and tangible commitment to development. In accordance with Annex 2 of the National Planning Policy Framework (NPPF), the site meets the definition of a deliverable site—being available now, located suitably, and achievable with a realistic prospect of delivery within five years.
NSP69	19-35 Sylvan Grove	23/AP/0582			298			298	Site does not have planning permission (for application 23/AP/0582) Resolution to grant at 28 November 2023 planning committee. S.106 agreement not yet signed. Extension of Time agreed until 30 November 2025. Previous planning permission (19/AP/2307) granted January 2022 for 219 homes and 2,986sqm B1 in buildnigs of 5-32 storeys.	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
	747-759 And 765-775 Old Kent Road And Land At Devonshire Grove	23/AP/1862				514		514		
NSP70	78 - 94 Ormside Street	23/AP/2226					49	49		
	79-161 Ilderton Road London Southwark SE16 3JZ	24/AP/3687				532		532		
	227-255 Ilderton Road	19/AP/1773	253					253	Site does not have planning permission Application 24/AP/3687 submitted 13 December 2024. Resolution to grant at planning committee 14.05.2025 No PP issued	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
	301-303 Ilderton Road	20/AP/3560				59		59		
	Ilderton Wharf 1 - 7 Rollins Street London SE15 1EP	24/AP/3575				270		270	Application ref. 21/AP/4757 granted permission June 2024 for 170 homes Application ref. 24/AP/3575 submitted 05.12.2024. Pending determination. Resolution to grant at planning committee 02.07.2025	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
	118-120 Ormside Street and 16-28 Penarth Street*	22/AP/1603				159		159	Site does not have planning permission Application submitted 06.05.2022. Resolution to granted at planning committee 14.06.2023 EoT agreed until 30.11.2025	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.

NSP71	Aldi Store - 840 Old Kent Road	19/AP/1322	168					168		
NSP73	634-636 Old Kent Road London SE15 1JB	18/AP/3463		46				46		
NSP78	Rotherhithe Gasometer	24/AP/0753					151	151	Site does not have planning permission Resolution to grant at planning committee 12.11.2024 No evidence of deliverability within 5 years	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
NSP79	City Business Centre Lower Road London Southwark SE16 2XB	23/AP/3487				60.4	50.4	110.8	Site does not have planning permission Resolution to grant at planning committee 08.10.2024 No evidence of deliverability in next 5 years	Southwark Council includes this site in its five-year housing land supply because it meets the National Planning Policy Framework (NPPF) definition of a deliverable site. A resolution to grant planning permission is in place, which demonstrates a clear commitment to development and confirms the site's deliverability under NPPF guidance.
NSP81	Canada Water Masterplan - Land Bounded By Lower Road (West), Redriff Road (South), Quebec Way (East) Surrey Quays Road And Canada Water Dock (North) And Site At Roberts Close	18/AP/1604				200	237	437	Construction on Zones A and K complete (under detail of original application). No other phases have started construction. Reserved matters for 21/AP/3775 (Zone L) & 21/AP/4712 (Zone F) & 22/AP/2439 (Zone G) permitted S.73 application pending determination (25/AP/0242). The viability statement in support of the Section 73 states at para 2.8 'Compounded by a period of sustained high build cost inflation and muted value growth, the viability of the Masterplan has become severely challenging to the extent that the HPP scheme cannot secure further investment and delivery cannot be progressed.	Construction has already been completed on Zones A and K under the original permission, demonstrating a clear commitment to delivery. Reserved matters approvals have been secured for Zones L, F, and G, and a Section 73 application is currently pending, indicating continued engagement with the planning process. While the viability statement highlights current challenges, the submission of the Section 73 application itself reflects an active effort to revise the scheme to enable future delivery. This ongoing activity suggests that the site retains potential to come forward within the five-year period, in line with the NPPF definition of a deliverable site.
NSP85	Chatelaine House 182-202 Walworth Road	24/AP/0892					136	136		
			TOTAL HOMES					**14656.9**		