

Decision Maker: **DEVELOPMENT CONTROL COMMITTEE**

Date: **Wednesday 18 March 2020**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **AUTHORITY MONITORING REPORT 2017/18 AND HOUSING
STATISTICAL UPDATE**

Contact Officer: Ben Johnson, Head of Planning Policy and Strategy
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Chief Officer: Assistant Director (Planning)

Ward: (All Wards);

1. Reason for report

- 1.1 This report seeks the Committee's agreement to publish the Council's Authority Monitoring Report (AMR) for the period from 1st April 2017 to 31st March 2018 (2017/18); the document is provided at Appendix 1. The AMR is a statutory requirement and sets out key information about the planning system in the London Borough of Bromley ("the Borough") for 2017/18, and the extent to which the Council's planning policies are being implemented.
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2. **RECOMMENDATION(S)**

- 2.1 **That Development Control Committee agree the document at Appendix 1 as the Council's Authority Monitoring Report for 2017/18.**

Impact on Vulnerable Adults and Children

1. Summary of Impact: No impact
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Corporate Policy

1. Policy Status: The 2017/18 AMR monitors the 'Saved' policies of the Unitary Development Plan 2006, which was the extant local planning policy during the period from April 2017 to March 2018.
 2. BBB Priority: Vibrant, Thriving Town Centres Regeneration
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Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: Planning Strategy and Projects
 4. Total current budget for this head: £0.596m
 5. Source of funding: Existing revenue budget 2019/20
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Personnel

1. Number of staff (current and additional): 10 FTE
 2. If from existing staff resources, number of staff hours: N/A
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Legal

1. Legal Requirement: Statutory Requirement: Regulation 35 (Part 2) of the Planning and Compulsory Purchase Act 2004 (as amended), and Regulation 34 (Part 8) of the Town and Country Planning (Local Planning) (England) Regulations 2012
 2. Call-in: Not Applicable
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Procurement

1. Summary of Procurement Implications: N/A
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

Authority Monitoring Report

- 3.1 The Authority Monitoring Report (AMR) in the appendix sets out key information about the planning system in the London Borough of Bromley (“the Borough”) for the period 1st April 2017 to 31st March 2018 (2017/18), and the extent to which the Council’s planning policies are being implemented. The AMR monitors the ‘Saved’ policies from the Unitary Development Plan (UDP) 2006 which was the extant planning policy during the monitoring period; this is the last AMR that monitors the UDP, as the next AMR (covering 2018/19) will monitor the Bromley Local Plan which was adopted in January 2019.
- 3.2 The AMR assesses whether development, both approved and implemented, contributes to achieving the spatial strategy of the Borough, and targets set out within the UDP and London Plan. It also reports on the progress of Local Plan preparation and monitors signed s106 agreements for the 2017/18 financial year.
- 3.3 Legislation requires the Council to prepare and publish monitoring reports, analysing how planning document preparation work has progressed against the published timetables and the effects that the implementation of policies may be having on the locality. Monitoring is essential in assessing whether existing planning policies are achieving their objectives.
- 3.4 The report contains data on a range of indicators identified by the Council as outlined in relevant sections of the document. These indicators are intended to measure the effectiveness of the Council’s planning policies in achieving sustainable development. This means meeting the development needs of the Borough whilst achieving a sustainable economy, safeguarding environmental assets, and addressing community needs.
- 3.5 The AMR includes the monitoring of the Government’s increased flexibilities in the planning system and greater permitted development rights, for example, allowing a change of use from office to residential use.

Housing statistical update

- 3.6 The delivery of new housing is one of the key policy requirements which the local planning authority must meet. The AMR details housing completions between 2013/14 and 2017/18. The following statistics provide some context of housing delivery across a longer time period, from 2009/10 to 2019/20 (YTD).
- 3.7 The borough’s housing completions have consistently met relevant housing targets, as shown on figure 1 below; Bromley have delivered less than the housing target on only two FYs between 2009/10 and 2018/19, one of which is 2017/18 (the period covered by the latest AMR). Across the period 2009/10 to 2018/19, housing delivery exceeded the cumulative housing target by 19%. However, as noted in the AMR, the supply of future housing sites is increasingly limited, and continued meeting and exceeding of housing targets will necessitate new sites coming forward. The scale of new sites needed is further amplified by the imminent 20% increase in the borough’s housing target. If a supply of sites cannot be found, then the likely consequence is that the ‘presumption in favour of sustainable development’ will continue to apply for the foreseeable future, which risks certain policies in the Local Plan being undermined on an ad hoc basis and would likely necessitate a review of the Local Plan.

- 3.8 Over the 2009/10 to 2018/19 period, over 8,500 homes have been approved, the majority on small sites¹ of 1-9 units. Annual approvals are shown in figure 2 below.
- 3.9 Figure 3 plots approvals and completions together. Even accounting for a lag in approvals being built out, this suggests that a high level of approvals does not mean subsequent high completion rates. Overall, completions over the period 2009/10 to 2018/19 are 77% of the total units approved over the same period. While there may be a number of approvals which remain extant and could yet come forward to completion, this does suggest that there are potentially suitable sites which are not realising their housing potential.
- 3.10 The lapse rate of approved applications, i.e. applications which do not implement within three years from the grant of planning permission, is generally consistent across the period 2009/10 to 2018/19, ranging from a low of 2.7% to a high of 10.43%, as shown in figure 4. Coupled with the 'gap' between approvals and completions noted shown in figure 3, this suggests that there are a number of sites which have implemented (and therefore cannot lapse) but not built out. The majority of lapsed units, around two-thirds, are on small sites of 1-9 units, which could reflect the likely additional financial constraints experienced by smaller developers. This also suggests that any increased reliance on small sites to meet housing targets could be compromised by such approvals not materialising, and may mean that an increased rate of small sites approvals is needed to realise delivery at a rate envisaged by the draft London Plan.
- 3.11 Figure 5 plots the total number of planning applications (for all uses) received against the number of applications approved (from figure 2). The total number of applications is shown for the purposes of comparing the trend lines against trends of planning approvals. The total number of applications reflects the most common type of applications and does not include pre-apps, applications subsequently withdrawn and AODs, amongst other types of applications. It should be noted that there is also likely to be an element of double counting of certain sites (especially over the entire period) as it could include instances where an application has been refused and subsequently permitted via a separate permission.
- 3.12 Comparing the trend lines shows no discernible pattern, aside from increases in total applications and approvals across 2014/15 to 2016/17. However, the figures vary year on year; 2010/11 saw the rate of approvals running at 57% of total applications, and had the lowest number of applications of any year during the period in question (2009/10 to 2019/20), whereas the rate was 18% in 2017/18 and 2012/13. The 2010/11 figures could be reflective of the recession at the time and the fact that there may have been less speculative (and likely less policy compliant) applications submitted.
- 3.13 Figure 6 shows the amount of affordable housing completed and approved (total figure and broken down into intermediate and social/affordable rented). The percentage of total completions, as a proportion of figure 1, is also shown. Across the period, the level of affordable housing delivery is almost one third of total housing delivery, although the figures for individual years vary wildly, from 8% to 66%. The overall figure for the period is skewed by higher delivery early in the period; between 2015/16 and 2018/19, the four most recent years where full data is available, the average annual delivery is 13%.

¹ The borough's housing target includes a small site component where a small site is defined as any site less than 0.25 hectares.

Figure 1: Bromley housing completions 2009/10 to 2019/20 (YTD)

	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20 (YTD)	Total
Completions (total)	558	755	646	527	702	430	769	922	588	709	371	6977
Small Sites	245	309	385	235	186	171	336	587	375	198	232	3259
Large Sites	313	446	261	292	516	259	433	335	213	511	139	3718
% of housing target delivered	112%	151%	129%	105%	140%	86%	120%	144%	92%	111%	58%	

Figure 2: Bromley housing approvals 2009/10 to 2019/20 (YTD)

	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20 (YTD)	Total
Approvals (total)	691	1418	1045	464	489	1275	785	1112	615	691	861	9446
Small Sites	415	358	377	262	370	628	640	596	442	496	275	4859
Large Sites	276	1060	668	202	119	647	145	516	173	195	586	4587

Figure 3: graph of housing approvals and completions

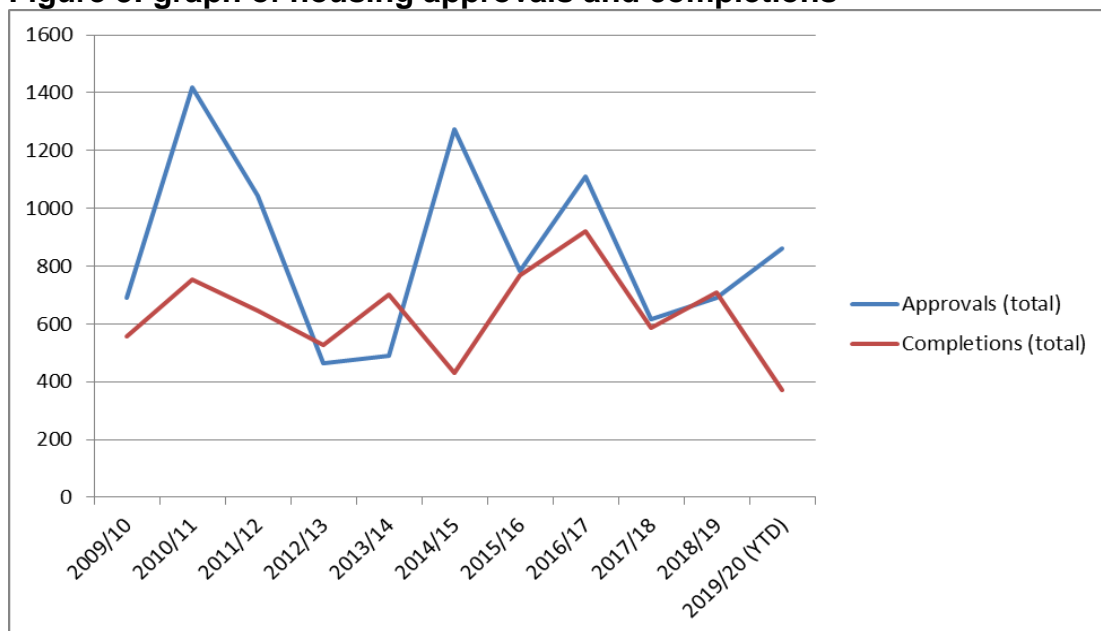


Figure 4: lapsed applications 2009/10 to 2018/19

	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Lapsed permissions (lapsed in FY)	57	47	51	36	51	57	21	46	33	26	425
% of approvals (figure 2)	8.25%	3.31%	4.88%	7.76%	10.43%	4.47%	2.68%	4.14%	5.37%	3.76%	4.95%

Figure 5: total number of planning applications received against the number of applications approved 2009/10 to 2019/20 (YTD)

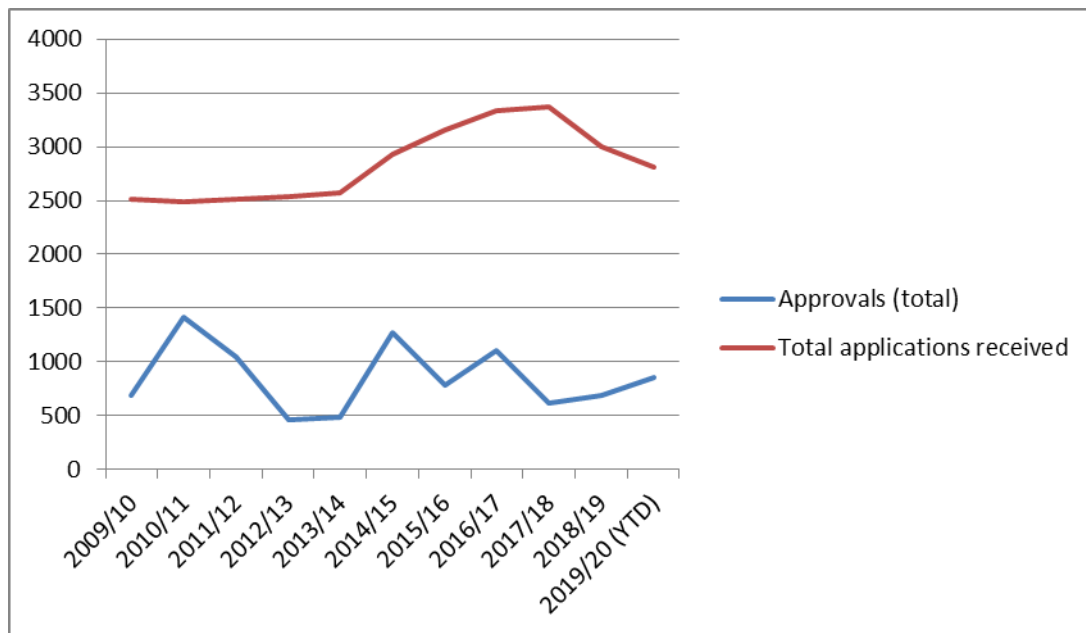


Figure 6: affordable housing approvals and completions 2009/10 to 2019/20 (YTD)

	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20 (YTD)	Total
AH Approvals (total)	211	181	109	59	19	129	13	85	41	63	173	910
<i>Social/affordable rented</i>	25	14	59	38	15	109	5	50	27	45	102	387
<i>Intermediate</i>	186	167	50	21	4	20	8	35	14	18	71	523
AH completions (total)	279	497	357	332	54	204	86	74	88	171	19	2142
<i>Social/affordable rented</i>	137	377	263	228	33	139	73	38	4	41	11	1333
<i>Intermediate</i>	142	120	94	104	21	65	13	36	84	130	8	809
AH % of total housing completions (figure 1)	50%	66%	55%	63%	8%	47%	11%	8%	15%	24%	5%	32%

4. POLICY IMPLICATIONS

- 4.1 The AMR monitors progress against 'saved' policies from the Unitary Development Plan (2006) for Bromley. This is the last AMR that will monitor UDP policies; the next AMR (covering 2018/19) will assess the progress against policies in the Bromley Local Plan, which was adopted on 16 January 2019, during the 2018/19 monitoring year.

5. FINANCIAL IMPLICATIONS

- 5.1 There are no financial implications resulting from this report.

6. LEGAL IMPLICATIONS

- 6.1 Under Regulation 35 (Part 2) of the Planning and Compulsory Purchase Act 2004 (as amended), local planning authorities are required to monitor and review the implementation of the Local Development Scheme (LDS) and the extent to which policies set out in the Local Development Documents are being achieved.

Non-Applicable Sections:	N/A
Background Documents: (Access via Contact Officer)	The Planning and Compulsory Purchase Act 2004 The Localism Act 2011 The Town and Country Planning Regulations 2012 Unitary Development Plan (Saved Policies) 2006 Bromley Local Plan 2019