

Housing, Planning and Regeneration Risk Register - Appendix C8

Q2 2020/21

| REF | DIVISION | RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title) | RISK CAUSE & EFFECT | RISK CATEGORY | GROSS RISK RATING (See next tab for guidance) | | | | | EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK | CURRENT RISK RATING (See next tab for guidance) | | | | | FURTHER ACTION REQUIRED | RISK OWNER |
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| 1 | All | Failure to deliver Housing Financial Strategy | <p>Cause(s):</p> <ul style="list-style-type: none"> - Demand led statutory services which can be difficult to predict - High number of households meeting criteria for temporary accommodation - Lack of suitable housing in-borough - Impact of COVID-19 on tenancies including changes to government directives (such as Everyone In), increased placements and their cost, reduced rental income for properties and progressing building works - Increased costs at 2 Traveller Sites due to unexpected police operation. Lack of income as a result of un-tenanted pitches. <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to achieve a balanced budget | Financial | 5 | 5 | 25 | <ul style="list-style-type: none"> - Match financial planning to Council priorities - Plans to deliver £11m of identified savings in Housing through work of Housing Transformation Board - Budget monitoring and forecasting - Regular reporting to CLT and Members via the Committee reporting process - Internal audit framework - Regular review of strategies to prevent homelessness and identify/develop temporary accommodation housing - Determination at planning stage to ensure collection of obligations due (S106) - Conditions attached to S106 funding received to ensure it is spent on preventing homelessness - Constantly reviewing service operations for potential efficiencies - Housing Strategy agreed by Council Executive - February 2020 | 4 | 5 | 20 | <ul style="list-style-type: none"> - Housing Transformation Board to increase rate and pace of affordable housing supply. Six schemes approved by Members for progression. - Options appraisal on future housing delivery models completed and passed to Members for consideration. This includes seeking to maximise grants for future delivery. - Adjustments being made to sites. New traveller site manager in post; focus on site standards and rental collection. | Director, Housing (Sara Bowrey) | | | | |
| 2 | Housing Needs | Failure to deliver effective Housing Needs services The Council is unable to deliver an effective Housing Needs service to fulfil its statutory obligations | <p>Cause(s):</p> <ul style="list-style-type: none"> - very demand led - lack of experienced staff - homelessness is increasing in number and complexity of cases needing maximisation of early intervention - Lack of awareness of where households need to approach services - Managing households approaching Council for help <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in need of Housing Services - Reputational damage - Legal challenge | Legal | 4 | 4 | 16 | <ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Implementing the Homelessness Strategy - setting up the multi-agency Homelessness Forum and taking forward the priorities of the Strategy - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Housing Transformation Board programme being implemented - Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation - New incentive campaign for private sector landlords embedded and benefits being realised. - Housing Strategy agreed by Council Executive - February 2020 | 2 | 4 | 8 | <ul style="list-style-type: none"> - Housing Transformation Board programme being implemented. Six schemes approved by Members for progression. Options appraisal on future housing delivery models completed and passed to Members for consideration. This includes seeking to maximise grants for future delivery. - Work continues with a range of housing providers to explore all options for increased supply and the revised offer to private landlords to increase access has been fully embedded. - Review of impact of Homelessness Reduction Act completed and level of early intervention increased for main cause of homelessness including enhanced debt and money advice. - Work required to address under-occupation and the generation of move on options within the social housing sector. - The new housing IT system offers a new more interactive on line housing advice model | Assistant Director, Housing (Lynnette Chamielec) | | | | |
| 3 | Housing Needs | Temporary Accommodation Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homelessness budgets | <p>Causes:</p> <ul style="list-style-type: none"> - Changes in government funding - Rising number of placements (approx. 20 per month) - Lack of local, affordable sustainable options - Increased homelessness and lack of access to accommodation <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in temporary accommodation - Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation) - Pressure on other services - increase in the number of out of borough placements | Social | 5 | 4 | 20 | <ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Implementing the Homelessness Strategy - setting up the multi-agency Homelessness Forum and taking forward the priorities of the Strategy - Working with local churches through the Transforming Bromley Borough Group to increase opportunities for outreach work. - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Housing Transformation Board programme being implemented - Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation - New incentive campaign for private sector landlords embedded and benefits being realised. | 4 | 4 | 16 | <ul style="list-style-type: none"> - Housing Transformation Board progressing projects to increase cost-effective temporary accommodation and affordable housing supply. Six schemes approved by Members for progression. Options appraisal on future housing delivery models completed and passed to Members for consideration. - Transformation Board action plan in place for next 3-4 years. - Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation and establish longer term tenancies. - Work innovatively with a range of providers to increase access to a supply of affordable accommodation. Housing Association Development Group established to progress developments in borough and share good practice. - Regeneration options on Housing Association estates under discussion to increase affordable housing supply. - Intake and Early Intervention service to meet Homelessness Reduction Act. Review effectiveness to address causes of homelessness. - Design work now underway for the modular schemes with planning submissions being progressed; the first of which has been approved. | Assistant Director, Housing (Lynnette Chamielec) | | | | |

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| 4 | Housing Needs (Housing Strategy) | Capital Grant Failure to deliver the Council's affordable housing strategy in support of statutory obligations Lack of infrastructure in place where growth is occurring (Section 106 monies) | Cause(s): - Lack of availability of external capital grant (Housing Associations) to deliver key housing schemes - Lack of available suitable sites within the borough on which to develop new affordable housing schemes over the short to medium term together with delays in completing developments - Potential fluctuations in house prices and supply chains - Schemes not granted planning permission to develop identified sites Effect(s): - Failure to fulfil statutory obligations - An inadequate supply of housing will lead to an inability to meet housing needs of a range of client groups in support of statutory housing and homelessness duties. | Social | | 4 | | 4 | | 16 | | | 3 | | 4 | | 12 | - Additional measures to be explored in accordance with the Housing Strategy. - Seeking to increase capacity for housing development support to ensure Housing Associations are supported and encouraged to develop affordable homes and that planning is aligned to the Local Plan. Review following publication of London Plan. - Using Development Group to work with Housing Associations to encourage increased affordable housing development through sharing good practice and supporting smaller associations. - Working group established to review and maximise s106 spend for new affordable housing supply. | Assistant Director, Housing (Lynette Chamielec) |
| 5 | Housing, Planning and Regeneration | Recruitment and Retention Failure to recruit and retain key skilled staff with suitable experience/qualifications | Cause(s): - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced workers Effect(s): - Failure to identify and meet service user needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Lack of skill sets result in an inability to deliver effective housing services and planning services as well as progressing housing and regeneration schemes. - Impact on life chances and outcomes of families and young people. | Personnel | | 5 | | 4 | | 20 | | | 3 | | 4 | | 12 | - Continue to benchmark grades and packages to remain competitive. - Rolling programme to convert agency staff to permanent positions. - Grow your own apprenticeship in building control established. | Director, Housing (Sara Bowrey) Director, Human Resources (Charles Obazuaye) |
| 6 | Housing Needs | Welfare Reform Impact of Welfare Reform legislation (including Universal Credit). | Cause(s): - Ongoing concerns about delays with Universal Credit and the impact of the benefit cap on families Effect(s): - Increased Rent Arrears - Lack of affordable/sustainable local options - Subsequent evictions and landlords reluctant to rent properties to claimants. | Social | | 4 | | 4 | | 16 | | | 3 | | 3 | | 9 | - Work in partnership with Housing Benefit, the DWP, partner landlords and Social Care to minimise the impact of the Welfare Reform Act - Setting up working group with Housing Associations to explore additional measures to support residents with the rollout of Universal Credit - CAB Universal Credit advice service went live in April 2019. Close working with CAB to ensure identification and support to those at risk. - Review rent arrears procedures and support for debt advice in temporary accommodation. - Monitor the impact of financial difficulties due to COVID-19 and offer advice to those where eviction action halted under current regulations. - DHP moved across to operational housing / Liberata to manage. | Assistant Director, Housing (Lynette Chamielec) |

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| 7 | Housing, Planning and Regeneration | Business Interruption / Emergency Planning Failure to provide Council services or statutory requirements of mass illness/fatalities scenario following a business interruption or emergency planning event | Cause(s): - Business Interruption could be caused by Loss of Facility (fire, flood etc.), Staff (illness, strike) or IT (cyber attack). - Mass fatalities or illness has a range of causes and this risk to the council could be caused by council staff being impacted resulting in failure to manage statutory requirements of mass illness/fatalities scenario (e.g. registering of deaths within timescales) Effect(s): - Business interruption - failure to deliver services, loss of customer / resident satisfaction. - Emergency planning - failure to deliver statutory duties. | Personnel | | 2 | | 5 | 10 | Business Interruption - Civil protection and emergency planning policies in place at corporate level overseen by the Corporate Risk Management Group - Business Continuity Plans in place at service level. Reviewed and updated. - Contracts contain business continuity provision - Communication to all staff prior to all impending industrial action, informing of any possible service disruption as well as explaining implications of strike action for individual staff members Emergency Planning - Robust plans in place, including Outbreak Plan, Flu Plan and Pandemic Flu Plan - Alert system via the South East London Health Protection Unit (SEL HPU) - Annual Flu vaccination programme in place | | 1 | | 5 | 5 | - Business Continuity Plans reviewed annually. | Director, Housing (Sara Bowrey) |
| 8 | Strategy, Performance and Corporate Transformation | Data Collections Failure to undertake statutory statistical data collections; including key housing and planning information, thereby adversely affecting government grant allocations and performance assessments | Cause(s): - Business Interruption Effect(s): - Failure to commission effectively - Adverse impact on the timing and quality of decision making | Data and Information | | 3 | | 3 | 9 | - Schedule of statutory returns has been incorporated into the Performance and Information team's work programme - Specialist members of the team for each area - Other staff trained to provide 'back up' for specialist members of the team - Good project planning in place to co-ordinate all data collections including contributions from other services | | 1 | | 3 | 3 | | Assistant Director, Strategy, Performance & Corporate Transformation (Naheed Chaudhry) |
| 9 | Strategic Property | Financial Performance Failure to reach expected income through rental income and property disposal | Cause(s): - Failure to lease all properties - Failure to eliminate rent arrears - Downturn in property market - Impact of COVID-19 on retail and property markets - Non-payment of rent on properties Effect(s): - Reduced rental income - Reduced capital income - Impact on overall Council budget | Financial | | 3 | | 5 | 15 | - A programme of rent reviews, lease renewals, new lettings, lease renegotiations, cost recharges and cost refunds is being carried out by Custman and Wakefield to realise the target of £1m. - Rental deferrals monitored and repayment plans arranged from property portfolio. | | 2 | | 5 | 10 | - Work with Liberata to pursue rental arrears | Assistant Director, Strategic Property (Michael Watkins) |
| 10 | Strategic Property | Health and Safety Regulations Failure to comply with statutory regulations in Council occupied and leased properties | Cause(s): - Inadequate risk assessments - Lack of capacity to discharge the Council's H&S responsibilities - Ineffective monitoring of risks Effect(s): - Potential prosecution of Council and/or civil claims for compensation - Insurance claims - Potential accidents/fatalities - Corporate manslaughter | Physical/ Legal/ Financial | | 3 | | 5 | 15 | - Corporate Safety Adviser employed - Safety Policies reviewed and updated - Health and Safety works provided through Amey - Contractors held to account for managing Council premises to required legal standards | | 2 | | 5 | 10 | | Assistant Director, Strategic Property (Michael Watkins) |
| 11 | Strategic Property | Contractor Performance Failure to deliver facilities management service | Cause(s): - Inadequate qualified staffing resources - Lack of capacity to deliver outcomes Effect(s): - Failure to deliver statutory obligations - Poor performance impacts on work of Council officers | Contractual and Partnership - Operational | | 3 | | 5 | 15 | - Regular monitoring of performance and key performance indicators - Contractors make regular reports to Members on delivery of contract - Contract reviewed and escalation for change available subject to Contract Change Notification - Business continuity plans in place and draft Exit Plan received | | 2 | | 5 | 10 | - Benchmarking of contract in progress to inform the future of the contract - A series of recommendations regarding the future direction of the contract to be submitted to Executive in 2020 | Assistant Director, Strategic Property (Michael Watkins) |

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| 12 | Culture and Regeneration | Outreach Service Failure to provide service in Cotmandene and Mottingham | Cause(s): - Buildings vulnerable to water and sewerage issues - Small staff base vulnerable to stress and sickness - Reduced service - recovering after COVID-19 closure Effect(s): - Failure to deliver full service - Closure of outreach centres - Impact on vulnerable adults | Social | | 4 | 4 | 12 | | | 4 | 4 | 12 | - Daily, weekly and monthly Health & Safety checks to be continued - Lone working policy, CCTV and panic buttons, risk assessments in place and regularly reviewed - Allocating time for joint team meetings and staff training whilst maintaining delivery of service - Recruitment to vacant post to enable full complement of staff | Assistant Director, Culture and Regeneration (Lydia Lee) | | |
| 13 | Culture and Regeneration | Vitality and Prosperity of Town Centres Failure of town centres to attract footfall and spend for retail and leisure opportunities | Cause(s): - Failure to redevelop High Streets and diversify the offer - National trend for decline in the traditional retail sector in town centres and competition from out of town developments and online shopping - Risk that established Business Improvement Districts do not succeed at renewal or that planned Business Improvement Districts do not get established resulting in reduced revenue spend to support businesses in town centre locations. - Poor development in town centres - Lack of investment in town centre facilities and public realm. - Impact of COVID-19 on local economy Effect(s): - Reduction in town centre business occupancy and increase in vacancies - Loss of income from business rates and market charges, and reduction in income from parking charges - Poor public perception and negative publicity. - Lack of private sector or inward investment. - Reduction in property value. - Reduction in footfall and spend per head resulting in loss of business. | Economic | | 4 | 4 | 16 | | | 4 | 3 | 12 | - Work with businesses to investigate the viability of a Business Improvement District in West Wickham. - Create and implement a terms of reference document to redefine the relationship between Business Improvement Districts and the Council to better support the local economy. - Work with developers including Arell to bring forward sensitive town centre development that also secures improved facilities for community services. - Finalise town centre public realm improvement schemes. | Assistant Director, Culture and Regeneration (Lydia Lee) | | |
| 14 | Culture and Regeneration | Capital Schemes Failure to deliver housing schemes for temporary accommodation | Cause(s): - Failure to gain approval from Members for business cases - Failure to secure funding for schemes - Failure to deliver temporary accommodation schemes on time and in budget - Issues with land ownership and usage - Planning permission not granted or granted with conditions which impact adversely on costs - Issues with type of housing and construction - Lack of interest from market in developing sites - Impact of COVID-19 on construction industry and production of modular homes Effect(s): - Failure to provide number of temporary accommodation units identified - Failure to produced identified savings as part of Housing Transformation Board programme - Impact on vulnerable families and children | Financial/ Social | | 5 | 5 | 25 | | | 4 | 4 | 16 | - Further conversations required to be developed with services to understand short and longer term requirements of particular sites. - Legal advice sought on ownership and usage issues and actions identified. - Coordination across disposals programme to ensure revenue and housing targets can be met jointly. - Leadership team working with GLA on Crystal Palace. - Further upskilling and knowledge sharing across teams to bring forward development effectively. | Assistant Director, Culture and Regeneration (Lydia Lee) | | |

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| 15 | Culture and Regeneration | Library Service Failure to provide statutory library service | Cause(s): - Service provider ceases to trade due to financial difficulties - Service provider chooses to terminate contract - Council terminates contract because service provider fails to consistently meet KPIs - Service does not meet contracted levels because of industrial action - Impact of COVID-19 on usage and closure of libraries Effect(s): - Temporary cessation of library service in borough - Adverse public response - Possible impact on partners in shared use buildings - Social impact on vulnerable adults and families using library facilities and activities | Legal Reputational Social | | | 4 | 4 | 16 | - Monitoring of service provider to identify potential financial difficulties - KPIs monitored regularly: twice yearly reports to Members and monthly/annual review meetings with service provider. Extra monitoring measures put in place during COVID-19 - Exit plan in place to manage any closure of contracted service and bring service in-house which is regularly reviewed and updated. - Library without Walls created as a response to COVID-19 and has been retained as the 15th Bromley Library - Increased usage of social media to deliver activities for children and adults - Promotion of e-books, newspapers and magazines | | | 4 | 3 | 12 | | Assistant Director, Culture and Regeneration (Lydia Lee) |
| 16 | Planning | Planning Service Failure to deliver statutory requirements related to planning | Cause(s): - Failure of Planning IT service - Lack of suitably qualified staff to provide expertise within the service Effect(s): - Council enters 'designation' status resulting in major planning decisions being removed from Council decision-making process leading to income loss to Council and lack of local control - Failure to prevent unauthorised development - Failure to respond to planning applications within statutory timescales - Planning decisions overturned on appeal - Failure to enforce Tree Protection Orders, protect listed buildings and conservation areas - Adverse public response | Legal Financial Reputational | | | 3 | 4 | 12 | - Planning software upgraded annually and maintained by software developer. - Staffing levels and skill set appropriate for current levels of demand - Planning Advisory Service (PAS) review of service in June 2019 resulted in an improvement plan which is being delivered and reported to Members. - Appeals reviewed and learning implemented. | | | 2 | 3 | 6 | | Assistant Director, Planning (Tim Horsman) |
| 17 | Planning | Community Infrastructure Levy Failure to adopt local CIL and use for local infrastructure | Cause(s): - Failure to have local CIL schedule agreed and adopted - Failure to implement and collect the local CIL - Failure to use local CIL appropriately - Income impacted by COVID-19 Effect(s): - Lack of funding for infrastructure to support new developments - Lack of funding to provide Infrastructure Delivery Team | Legal Financial | | | 2 | 3 | 6 | - Review of local CIL commenced - Experienced Infrastructure Delivery Scheme Manager in post to ensure successful adoption of agreed local CIL - Impact of COVID-19 being monitored to ensure CIL does not discourage development | | | 2 | 3 | 6 | '- Updated action plan being developed and will be consulted on and introduced at end of 2020/21 | Assistant Director, Planning (Tim Horsman) |
| 18 | Planning | Section 106 Agreements Failure to complete S106 agreements for affordable housing | Cause(s): - Lack of appropriately qualified staff to ensure S106 agreements are implemented as appropriate - Lack of S106 Monitoring Officer in post Effect(s): - Impact on level of supporting infrastructure in borough - S106 monies not being spent on appropriate infrastructure and housing schemes | Financial Social | | | 3 | 3 | 9 | - Officer group in place to monitor and maximise s106 spend | | | 2 | 3 | 6 | - Ensure function of S106 Monitoring Officer included in proposed Infrastructure Delivery Team | Assistant Director, Planning (Tim Horsman) |

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| 19 | Planning | <p>London Plan Failure to deliver level of housing in Bromley contained in Mayor of London's plan</p> | <p>Cause(s): - Mayor of London's Plan requires greater levels of housing to be built in Bromley than in Local Plan - Planning permission for sufficient level of development not granted - Landbanking by developers resulting in targets of new houses not being met in a timely fashion</p> <p>Effect(s): - Bromley penalised at planning appeal stage</p> | Reputational Financial | | 5 | | 3 | 15 | - Local Plan policies being reviewed to identify suitable sites - Contribution to consultation stage of London Plan emphasising issues around small sites | | 3 | | 3 | 9 | - Review of Local Plan in line with London Plan once published in 2020 | Assistant Director, Planning (Tim Horsman) |