

# Authority Monitoring Report 1 April 2020 – 31 March 2021

November 2024

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#### 1 Introduction

#### The purpose of the Authority Monitoring Report

- 1.1 The Authority Monitoring Report (AMR) sets out key information about the implementation of planning policies in the London Borough of Bromley ("the Borough") for the period 1 April 2020 to 31 March 2021 (2020/21). Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the Regulations") sets out what the AMR should report on.
- 1.2 Consistent with the Regulations, this AMR assesses whether development, both approved and implemented, contributes to achieving the targets set out within the Local Plan and London Plan. It also reports on the progress of Local Plans and Supplementary Planning Documents (SPDs) against the Local Development Scheme (LDS) and the Council's duty to cooperate activities<sup>1</sup>.
- 1.3 Data published in this AMR has been taken from two main sources; the Planning London Database (PLD)<sup>2</sup> (formerly known as the London Development Database), which is maintained by the Greater London Authority (GLA), and from the Council's internal records relating to planning applications. Where other data sources have been used, references can be found underneath the relevant information.

#### Changes in policy and legislation

1.4 The following national and London-specific planning legislation, policy, and guidance was introduced in the monitoring period.

#### The New London Plan

- 1.5 Under legislation establishing the GLA (Greater London Authority Act 1999), the Mayor of London must produce a spatial development strategy (the London Plan). The London Plan forms part of the Development Plan for each of the London local planning authorities.
- 1.6 In July 2018, the Draft London Plan was submitted for examination, and a revised version of the Draft London Plan was published to include minor suggested changes, clarifications, corrections and factual updates that were prepared following a review of consultation responses. The Examination in Public (EiP) on the London Plan was held between January and May 2019, and the Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor in October 2019. The Mayor considered the Panel report and recommendations and prepared an

<sup>&</sup>lt;sup>1</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) also requires the Council to include CIL reporting information taken from the relevant Infrastructure Funding Statement (IFS). The Community Infrastructure Levy Regulations 2010 (as amended) requires the Council to publish its first IFS by 31/12/2020, and this will therefore be reported in the relevant monitoring period (2020/21). Published IFS documents will be available on the Council's website:

https://www.bromley.gov.uk/info/1004/planning\_policy/1179/bromleys\_community\_infrastructure\_levy 

The PLD is populated using data from local authorities, which is collated on an annual basis.

Intend to Publish version of the London Plan along with a statement of reasons for any recommendations that the Mayor chose not to accept. This was published on 9 December 2019. The Secretary of State directed changes to the Mayor's Intend to Publish version of the London Plan in March 2020 and the London Plan was subsequently published in March 2021.

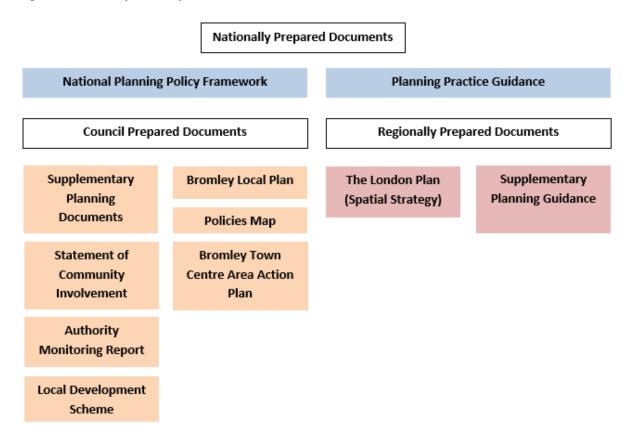
#### National Planning Policy Framework 2019

1.7 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England. The NPPF applies to decision-taking and plan-making, providing a framework within which Local Plans can be produced. The extant version of the NPPF during the monitoring period was published in February 2019.

#### **Local Policy Framework**

1.8 Bromley's policy framework for this AMR is outlined in Figure 1 below.

Figure 1: Bromley's Policy Framework



- 1.9 The Bromley Local Plan was adopted on 16 January 2019 and incorporates parts of the Bromley Town Centre Area Action Plan (AAP) and various SPDs.
- 1.10 The programme for the preparation of the Local Plan was set out in the previous version of the Local Development Scheme (LDS) published in August 2017. A revised Local Development Scheme was published in September 2020; this sets out an

indicative timetable for the production of future Local Plan documents and SPDs. Appendix 1 sets out progress made on the preparation of these documents.

1.11 There has been no neighbourhood planning activity in the Borough.

## **Duty to Cooperate**

- 1.12 The 'duty to co-operate' is a statutory duty for local authorities, which requires local planning authorities to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed, on local plan-making matters. The duty requires on-going, constructive collaboration and active engagement. The prescribed bodies include, but are not limited to, the Environment Agency, Natural England, the Mayor of London (as represented by the GLA), Transport for London and Highways England.
- 1.13 Throughout the preparation of the Bromley Local Plan and other planning policy documents, the Council have taken a collaborative approach to plan-making that considers a range of issues, including strategic matters.
- 1.14 Bromley is one of the five authorities forming the South East London sub-region. The other four authorities are Bexley, Greenwich, Lewisham and Southwark. The group of authorities hold regular meetings to discuss cross borough planning matters and also form the South East London Housing Partnership (SELHP) and South East London Joint Waste Planning Group. The Council also engages with other adjacent boroughs on a regular basis.
- 1.15 Bromley also actively engages with the GLA through regular duty to co-operate meetings to help achieve a full assessment of issues of cross-borough and London-wide relevance and alignment of strategic objectives and policies.

#### **Borough Context**

1.16 Bromley is geographically the largest of the London Boroughs, covering 58 square miles. Bromley has borders with the London Boroughs of Bexley, Croydon, Greenwich, Lambeth, Lewisham and Southwark; the Surrey district of Tandridge; and the Kent district of Sevenoaks.

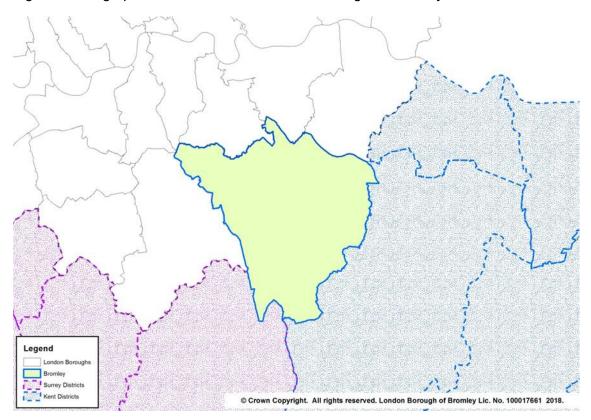


Figure 2: Geographical Context of the London Borough of Bromley

- 1.17 Bromley is a distinctive part of London's suburbs, closely connected to London's economy. It also has one of the largest economies south of the River Thames. Open countryside, protected by the Green Belt that encircles London, makes up over half the Borough.
- 1.18 The Borough occupies a strategic position in the South East of London and the wider South East England region, with rail connections to Central London and easy access to the M25, the National Rail Network, and major South East airports.
- 1.19 The 2019-based GLA population estimate<sup>3</sup> for the London Borough of Bromley is 332,335. Table 1 below shows the change in population since 2011.

Table 1: Bromley's Population

Estimated Population	London Borough of Bromley
Census Data 2011	309,392
GLA 2019-based population estimate 2019	332,335
Change 2011-2019	22,943
% change 2011-2019	7.11%

1.20 The population estimates show that the Borough's population has grown significantly in recent years. It is anticipated that by 2031, Bromley's population will rise further to

<sup>&</sup>lt;sup>3</sup> Greater London Authority, Housing-led population projection (2019-based) (2019) Available From: <a href="https://data.london.gov.uk/dataset/projections/">https://data.london.gov.uk/dataset/projections/</a>

370,369: an 11% increase from 2019. The anticipated population increase in the Borough will vary by ward.

# 2 Policy Monitoring

# **Annual Core Output Indicators**

2.1 This section summarises the monitoring results of planning policies from the Local Plan (2019), applications for the Self-build and Custom Build Register, and the loss of office to residential under Permitted Development Rights. Table 2 sets out the indicators that have been used to assess policy performance in 2020/21, reflecting the monitoring framework set out in Appendix 10.11 of the Local Plan.

Table 2: Annual Output Indicators

Indicator	Indicator	Local Plan Policy					
Number		-					
Open Space and the Natural Environment							
1.1	Change in Green Belt Land (ha) Policy 49 Green Belt						
1.2	Change in Metropolitan Open Land (ha)	Policy 50 Metropolitan Open					
		Land					
1.3	Change in Urban Open Space (ha)	Policy 55 Urban Open Space					
1.4	Change in Local Green Space	Policy 56 Local Green Space					
Health and \							
2.1	% of residential applications where	Policy 26 Health and					
	contributions are sought successfully	Wellbeing					
2.2	Net additional/improved sports and	Policy 21 Opportunities for					
	recreation facilities (school provision and	Community Facilities					
	publicly accessible)	Policy 28 Education					
		Facilities					
Homes							
3.1	Provision of new homes	Policy 1 Housing Supply					
3.2	Number of affordable homes	Policy 2 Provision of					
		Affordable Housing					
3.3	Number of units of specialist housing for	Policy 11 Specialist and					
	older people	Older Persons					
		Accommodation					
3.4	Number of developments demonstrating	Policy 13 Renewal Areas					
	economic, social, or environmental benefits						
3.5	Number of Traveller pitches/plots	Policy 12 Travellers					
		Accommodation					
	mployment and the Local Economy						
4.1	Changes in B Class floorspace in Strategic	Policy 81 Strategic Industrial					
	Industrial Locations (sqm)	Locations (SIL)					
4.2	Change in B class floorspace within Locally	Policy 82 Local Significant					
	Significant Industrial Sites (sqm)	Industrial Sites (LSIS)					
4.3	Employment floorspace on previously	Policy 83 Non-Designated					
	developed land (sqm)	Employment Land					
4.4	Change in B1(a) floorspace in Office	Policy 85 Office Clusters					
	Clusters (sqm)						
4.5	% of residential applications where	Policy 28 Education					
	education contributions are sought	Facilities					
	successfully	Policy 26 Health and					
		Wellbeing					
4.6	New permanent "Forms of Entry" provided	Policy 28 Education					
		Facilities					

Indicator	Indicator	Local Plan Policy						
Number								
Design and Public Realm								
5.1	Completion of public realm projects	Policy 37 General Design of Development						
Town Centr	es							
6.1	Number of vacant units (by centre)	Policy 92 Metropolitan and Major Town Centres Policy 94 District Centres Policy 95 Local Centres						
6.2	Footfall (by centre)	Policy 92 Metropolitan and Major Town Centres Policy 94 District Centres						
Built Herita		T =						
7.1	Number of listed buildings demolished/part demolished	Policy 38 Statutory Listed Buildings Policy 39 Locally Listed Buildings						
Transport	<del>,</del>	<u>,                                      </u>						
8.1	Completion of transport projects (as outlined in IDP)							
Environme	ntal Challenges							
9.1	Amount of local authority collected waste <sup>4</sup> arising and managed by type	Policy 112 Planning for Sustainable Waste Management						
9.2	Major applications with Sustainable Urban Drainage Systems, and s106 agreements for drainage and flood risk infrastructure	Policy 115 Reducing Flood Risk						
9.3	Number of applications approved for development of contaminated land	Policy 118 Contaminated Land						
9.4	Major developments meeting and exceeding carbon reduction targets, and monies from the carbon off-setting fund spent on local projects	Policy 124 Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy						
9.5	Capacity of renewal energy installations incorporated into major developments	Policy 124 Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy						
9.6	Increased use of decentralised energy networks	Policy 124 Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy						
Local Indica								
	Self-build and Custom Build Register	. B. 14						
	Office to Residential under Permitted Develop	ment Rights						

## **Open Space and the Natural Environment**

2.2 Approximately 9,000 hectares of the Borough is designated as Green Belt, Metropolitan Open Land, Urban Open Space, and Local Green Space. It is estimated

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<sup>&</sup>lt;sup>4</sup> Local authority collected waste was formerly called municipal waste. See <a href="https://www.gov.uk/local-authority-collected-waste-definition-of-terms">https://www.gov.uk/local-authority-collected-waste-definition-of-terms</a> for an explanation of the change.

that there is around 4 hectares of publicly accessible open space per 1,000 people. Monitoring open space and the natural environment is important to ensure that the natural environment is managed and protected by improving the quality of open space and encouraging provision in areas of deficiency and new development.

- 2.3 Planning permissions on designated land have been calculated excluding permissions for the following:
  - Details Pursuant;
  - Adverts;
  - Conversions (with no new buildings);
  - Conservation Area Consents;
  - Windows;
  - Changes of Use;
  - Telecoms;
  - Temp uses of Caravans/Mobile Homes;
  - Fences and Gates:
  - Trees;
  - Lawful Development Certificate;
  - Temporary use as a Carpark;
  - EIA Screening;
  - · Minor Alts to development permitted already; and
  - Conditions.

#### Indicator 1.1: Change in Green Belt

- 2.4 In March 2021, there was an estimated 7,660ha of designated Green Belt in the Borough<sup>5</sup> following the adoption of the Local Plan. There was no change in Green Belt during the monitoring period.
- 2.5 There were 93 determined full planning applications in the Green Belt during the monitoring period. 56 were permitted, and mostly relate to side/rear extensions on existing/replacement buildings that do not exceed the existing footprint. The remaining 37 were refused.

#### Indicator 1.2: Change in Metropolitan Open Land

- 2.6 In March 2021, there was an estimated 668ha of designated Metropolitan Open Land in the Borough. There was no change in Metropolitan Open Land during the monitoring period.
- 2.7 There were 3 determined full planning applications on Metropolitan Open Land during the monitoring period. All 3 were refused.

#### Indicator 1.3: Change in Urban Open Space

<sup>&</sup>lt;sup>5</sup> MHCLG Annual Green Belt Return 2018-19

- 2.8 In March 2021, there was an estimated 632ha of designated Urban Open Space in the Borough. There was no change in Urban Open Space during the monitoring period.
- 2.9 There were 9 determined full planning applications on Urban Open Space during the monitoring period. All 9 were permitted, including replacement buildings and the formation of an artificial Multi-Use Games Area.

#### Indicator 1.4: Change in Local Green Space

2.10 In March 2021, there was an estimated 120ha of designated Local Green Space in the Borough. There have been no changes to Local Green Space in 2020/21.

#### **Health and Wellbeing**

2.11 Monitoring health and wellbeing is important to ensure that Bromley not only produces healthier environments and infrastructure to support people in living fuller, longer, healthier, and more sustainable lives, but that new community facilities are appropriately located to provide accessible, effective, and modern services.

Indicator 2.1: % of residential applications where contributions are sought successfully

# Indicator 4.5: % of residential applications where education contributions are sought successfully

- 2.12 Nine major planning applications were permitted (with a signed legal agreement) in 2020/21, including permissions on appeal. The following total approximate amounts were secured from these three applications:
  - Carbon offsetting ~£371,512.00
  - Education ~£324,049.15
  - Health ~£214,091.00
  - Affordable Housing ~£623,830.00

# <u>Indicator 2.2: Net additional/improved sports and recreation facilities (school provision and publicly accessible)</u>

2.13 There were no improved sports and recreation facilities in 2020/21.

#### Homes

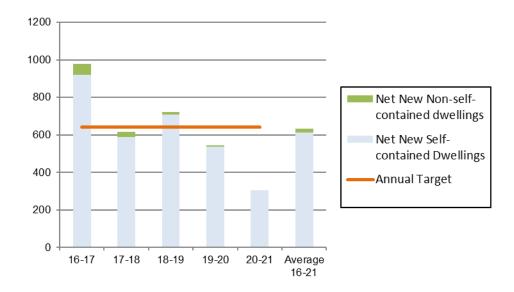
- 2.14 Monitoring the provision of new homes is important to ensure that there is an appropriate supply of homes to meet the varied needs of the local population, and to ensure new homes are designed to minimise environmental impacts and are supported by appropriate social and environmental infrastructure.
- 2.15 The Ministry of Housing, Communities and Local Government (MHCLG) set out that the 2020 and 2021 Housing Delivery Test targets for boroughs would be reduced to account for fluctuating levels of housing delivery as local authorities and the construction industry faced disruption at a national, regional, and local level due to the

pandemic. This resulted in Bromley's housing requirement targets reduced to 427 for the 2020/21 financial year.

#### Indicator 3.1: Provision of new homes

2.16 In 2020/21, there was a net increase of 305 self-contained dwellings in the Borough for this monitoring period.

Figure 3: Net new dwellings 2016/17 to 2020/21

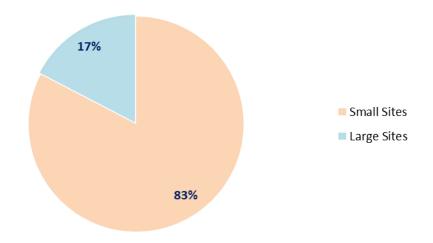


- 2.17 Figure 3 shows the level of housing completions in the Borough against the London Plan housing target over the last five years. The net total of 305 housing completions (PLD) is significantly lower than 2019/20 and misses the Council's annual target of 427 (adjusted from 641 in The Housing Delivery Test to account for the impact of the covid-19 pandemic) by 29%. This is likely as a direct result of the covid pandemic. However, Bromley's five-year average housing completion figure of 633 (self-contained and non-self-contained) is not far off the London Plan (2016) target of 641 units per annum.
- 2.18 The new London Plan was adopted during the monitoring period, which resulted in Bromley's housing target increasing from 641 homes per annum to 774 homes per annum. However, for the purposes of Indicator 3.1, the target remains 641 per annum as reflected in the Bromley Local Plan.

#### Small and Large Sites

- 2.19 The distribution of housing sites across the Borough has been broken down into small and large sites:
  - Small Sites: Sites less than 0.25 hectares in size.
  - Large Sites: Sites over 0.25 hectares in size.

Figure 4: Housing completions by size of site 2020/21



2.20 Figure 4 shows that only 83% (252 units) of the net self-contained housing completions were concentrated on small sites. The remaining 17% (53 units) were distributed across large sites.

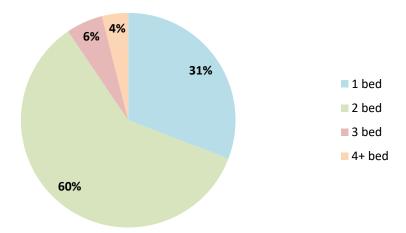
#### Local indicator: Office to Residential under Permitted Development Rights

2.21 During the monitoring period, approximately 15% (47 units) of net housing completions relate to prior approvals. Prior approvals allow for the conversion of office or retail floorspace to residential use.

### Types of new housing

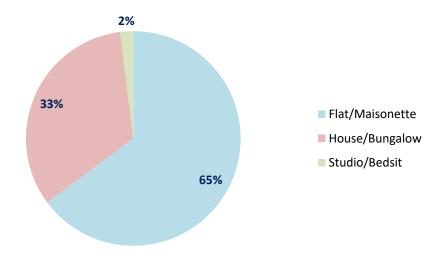
2.22 The provision of new housing should provide a variety in choice of accommodation to reflect local need as set out in the South-East London Strategic Housing Market Assessment (SHMA) (2014). The 2014 SHMA highlights that the highest level of need across tenures within the Borough up to 2031 is for 1-bedroom units (53%) followed by 2-bedroom (21%) and 3-bedroom (20%) units.

Figure 5: Housing completions by number of bedrooms 2020/21



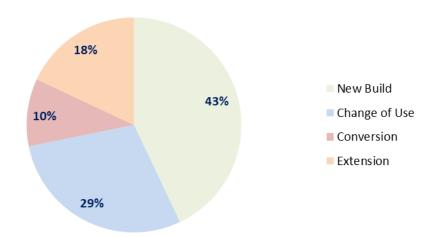
2.23 Figure 5 shows the number of housing completions (self-contained) by number of bedrooms in 2020/21. It shows that there has been a slight variety in unit size. 91% of housing completions have come in the form of one- and two-bedroom units, compared to 70% over the last monitoring period. The completion of three-bedroom units has decreased from 16% last year to 6%, whilst the completion of four-bedroom plus units has decreased from 14% to 4%.

Figure 6: Housing completions by type of dwelling 2020/21



2.24 Figure 6 shows that housing completions (self-contained) are predominantly (67%) in the form of flats and maisonettes, although this is down from 86% recorded over the last monitoring period.

Figure 7: Sources of new housing 2020/21



2.25 Figure 7 shows that 43% of net self-contained housing completions in the Borough were new builds (131 units). This is a decrease of 315 units from the previous monitoring period.

#### Indicator 3.2: Number of affordable homes

Table 3: Net Affordable Housing Completions<sup>6</sup>

Year	Total self- contained affordable units units		Affordable rent/Social		Intermediate		Affordable units as % of total self-
	completed (gross)	completed (gross)	Number	%	Number	%	contained completions
2016/17	979	74	38	51	36	49	8
2017/18	615	88	4	5	84	95	14
2018/19	731	171	41	24	130	76	23
2019/20	536	109	57	52	52	48	20
2020/21	305	11	2	18	9	82	4
Total	3,166	453	142	22	311	78	14
Average	633	90	28	31	62	69	14

- 2.26 Table 3 provides an overview of affordable housing completions by type over the last five years.
- 2.27 In September 2019, the GLA published additional data on affordable housing for programmes that they are responsible for. The dataset sets out the annual starts and completions by borough for units that will be available at Affordable Rent, Social Rent, Intermediate, and London Living Rent/Shared Ownership. The GLA's dataset records

<sup>6</sup> Greater London Authority, Affordable Housing Starts on Site and Completions (April 2020 – March 2021), available from <a href="https://www.london.gov.uk/what-we-do/housing-and-land/increasing-housing-supply/affordable-housing-statistics">https://www.london.gov.uk/what-we-do/housing-and-land/increasing-housing-supply/affordable-housing-statistics</a>

higher affordable housing delivery compared to data from the PLD over the same monitoring period. There are reasons for the discrepancies:

- Due to the way the PLD is monitored, the PLD includes data about schemes in the Borough where planning permission was granted based on securing affordable housing by way of Section 106 obligation/Unilateral Undertaking. It is based on information available to the Council on affordable housing provision at the grant of planning permission and may not necessarily reflect changes made post permission.
- Units recorded as being market units, at the point of granting permission, could later be acquired by registered providers and built out as affordable units as well as previously completed market units acquired by registered providers for the GLA housing programme that would not need planning consent for any form of development. This information would not be recorded by the PLD, but still leads to the delivery of additional affordable units that contributes to meeting affordable housing need.

#### Bromley local intermediate income thresholds (October 2024)

2.28 Paragraph 4.6.3 of the London Plan states:

"The Mayor is committed to delivering genuinely affordable housing. Within the broad definition of affordable housing, the Mayor's preferred affordable housing tenures are:

- Homes based on social rent levels, including Social Rent and London Affordable Rent
- London Living Rent
- London Shared Ownership"
- 2.29 Paragraphs 4.6.8 4.6.9 of the London Plan outline all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. For dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income, based on the household income limits set out above. Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit.
- 2.30 Paragraph 4.6.10 sets out that boroughs can set local intermediate income levels to reflect local housing need. Any local criteria including income caps below the maximum amounts set out in the London Plan should automatically cascade out to the London-wide eligibility criteria within three months to ensure that units are not left vacant. Re-sales and re-lets should be available to those meeting the London-wide income caps and not be restricted by local eligibility criteria.

- 2.31 The GLA Homes for Londoners Affordable Housing and Viability SPG (2017) refers to intermediate products including London Living Rent and / or shared ownership being the default tenures assumed in the intermediate category (paragraph 2.40).
- 2.32 Local intermediate housing income thresholds currently exist for new 1–3-bedroom intermediate ownership housing in Bromley. Local thresholds help to ensure that the intermediate housing units can be accessed initially by people on lower incomes compared to applying the London-wide thresholds from the outset. The current thresholds are set out in the Planning Obligations SPD<sup>7</sup>. The SPD states that these thresholds can be updated through the Council's AMR.
- 2.33 The existing gross income thresholds (upper limit) for intermediate ownership products are as follows:
  - 1-bedroom units £55,000
  - 2-bedroom units £68,800
  - 3-bedroom units £73,400
  - 4-bedroom units existing Greater London Authority limit of £90,000 applies for intermediate ownership<sup>8</sup>.
- 2.34 It is considered that there is a need to review the Council's existing local intermediate ownership housing income thresholds to ensure current local house prices are adequately reflected. It is noted that this AMR covers the period April 2020 to March 2021, but these updated thresholds reflect the position at the time of writing (October 2024) and will apply from the point this AMR is published.
- 2.35 The updated gross income thresholds for intermediate ownership products\_are as follows:
  - 1-bedroom units up to £60,367
  - 2-bedroom units up to £75,474
  - 3-bedroom units up to £80,503
  - 4-bedroom units existing Greater London Authority limit applies of up to £90,000 for intermediate ownership<sup>9</sup>.
- 2.36 The methodology used to prepare the updated thresholds is provided at Appendix 2.
- 2.37 The GLA upper limit of £67,000 applies to intermediate rent products for all unit sizes as set out in the GLA's London Plan Annual Monitoring Report<sup>10</sup>.

<sup>&</sup>lt;sup>7</sup> Available from: <a href="https://www.bromley.gov.uk/downloads/file/1823/planning-obligations-spd-adopted-june-2022-">https://www.bromley.gov.uk/downloads/file/1823/planning-obligations-spd-adopted-june-2022-</a>

<sup>&</sup>lt;sup>8</sup> As set out in the London Plan AMR 19, paragraphs 5.4.10 to 5.4.15, available from: <a href="https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021">https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021</a> 22%20%28final%29%20%281%29.pdf

<sup>&</sup>lt;sup>9</sup> Ibid

<sup>&</sup>lt;sup>10</sup> Ibid

#### Bromley Housing Trajectory September 2020

- 2.38 The Council agreed an updated Bromley Housing Trajectory in September 2020, including the Five-Year Housing Land Supply (FYHLS) based on the revised housing target of 774 units per annum set out in the Intend to Publish version London Plan (which was subsequently adopted in March 2021).
- 2.39 The position was that the FYHLS (covering the period 2020/21 to 2024/25) is 2,690 units, or 3.31 years supply. This was acknowledged as a significant undersupply and for the purposes of assessing relevant planning applications means that the presumption in favour of sustainable development will apply.
- 2.40 In accordance with paragraph 11(d) and footnote 7 of the NPPF (February 2019), in the absence of a five-year housing land supply the Council should regard Development Plan policies relating to the supply of housing which would include Local Plan Policy 1: Housing Supply as being 'out of date'. Therefore, the 'presumption in favour of sustainable development' will apply to applications proposing housing, in accordance with paragraph 11(d) of the NPPF.

#### Indicator 3.3: Number of units of specialist housing for older people

- 2.41 Bromley has the largest elderly population of all London boroughs, and that is set to continue to grow over the Local Plan period.
- 2.42 During the 2020/21 monitoring period there were 0 net completions for specialist housing (extra-care units).
- 2.43 New developments of specialist older persons accommodation in Bromley are currently well below the London Plan 2021 "annual borough benchmarks" figure of 210 new private/intermediate units per year. Whilst there is no London Plan borough figure for care beds, the provision of additional bed spaces per year over the last 5 years has been low relative to Bromley's older person's population.

# <u>Indicator 3.4: Number of developments demonstrating economic, social, or environmental benefits</u>

2.44 3 major planning applications were approved within the designated Renewal Areas in 2020/21. All were approved subject to a legal agreement. These applications provided 46 net residential units, offices, and retail, as well as contributions to health, education, and carbon offsetting.

#### <u>Indicator 3.5: Number of Traveller pitches/plots</u>

- 2.45 The London Plan 2021 does not set Borough targets for traveller pitches/plots but requires in Policy H14 that local authorities plan to meet the identified need for permanent gypsy and traveller pitches (including travelling show people) and must include ten-year pitch targets in their Development Plan Documents.
- 2.46 In 2020/21 there were a total of 49 Gypsy and Traveller Pitches and 29 Travelling Showman Plots with permission in the Borough.

#### Local indicator: Self-build and Custom Build Register

- 2.47 Bromley's self-build and custom build register was opened on 31 October 2016. The Council should provide permissions for serviced plots to meet demand arising from the register. Demand is measured by the number of entries on the register in specific base periods, which run from 31 October to 30 October each year. The Council has three years from the end of each base period to provide permissions.
- 2.48 Bromley exercised its option to introduce a local connection test in November 2020 (during the monitoring period) but has not introduced any other local eligibility conditions at the time of writing. Bromley's local connection test requires applicants to demonstrate a local connection to the borough by demonstrating that they have been resident in the borough for a continuous period of five years, up to and including the day of application for entry onto the register<sup>11</sup>.
- 2.49 Where a relevant authority sets local eligibility conditions, the register must be divided into two parts, referred to as Part 1 and Part 2 of the register. To be eligible for Part 1, an individual (or association of individuals) must address the relevant requirements set out in regulations and any local eligibility conditions. If an individual (or association of individuals) addresses the relevant requirements set out in regulations but not a local connection test, then they are eligible for entry onto Part 2 of the register.
- 2.50 The duty to provide enough serviced plots to meet self-build demand does not apply in relation to any person entered in Part 2 of the register. Only entries on Part 1 of the register count towards the number of suitable serviced plots that the council must grant development permission for. Relevant authorities must have regard to the entries on Part 2 when carrying out their planning, housing, land disposal and regeneration functions, for example, in plan-making the starting point for establishing overall demand for self-build and custom housebuilding would be the number of registrants on Part 1 and Part 2 of the register.
- 2.51 Between October 2020 and October 2021 (base period 6) there were 65 self-build and custom housebuilding registrations. 9 registrations were on Part 1 of the register, and 56 registrations were on Part 2 of the register.

#### **Business, Employment and the Local Economy**

2.52 Employment in the Borough is forecast to increase by 22% over the Local Plan period, from 116,000 jobs in 2011 to 138,000 jobs in 2031<sup>12</sup>. It is important to ensure that there is an appropriate supply of commercial land and range of flexible quality business premises across the Borough and limit the loss of B-class floorspace in designated areas. Where possible, appropriate provision of facilities to deliver high quality education and training must also be supported.

<sup>&</sup>lt;sup>11</sup> Further information is available on the Council's website: <a href="https://www.bromley.gov.uk/planning-policy/self-build-custom-house-building-register/2">https://www.bromley.gov.uk/planning-policy/self-build-custom-house-building-register/2</a>

<sup>&</sup>lt;sup>12</sup> 2017 Employment projections for London by borough, available from: <a href="https://data.london.gov.uk/dataset/long-term-labour-market-projections">https://data.london.gov.uk/dataset/long-term-labour-market-projections</a>

2.53 Despite some decline of manufacturing employment in the Borough, industry and warehousing remain important elements of the local economy. There is approximately 120 hectares of land in industrial or warehousing use; the majority being concentrated within the Cray Business Corridor, Lower Sydenham, Elmers End, and Biggin Hill.

<u>Indicator 4.1: Changes in B Class floorspace in Strategic Industrial Locations (sqm)</u>

Indicator 4.2: Changes in B Class floorspace in Locally Significant Industrial Sites (sqm)

<u>Indicator 4.4: Changes in B Class floorspace in Office Clusters (sqm)</u>

2.54 The Monitoring Framework sets a target of no loss of B Class floorspace or employment floorspace capacity within any SIL, LSIS, or Office Clusters. Table 4 outlines the changes in B Class floorspace within these designations. There was a gain of B Use Class floorspace in Strategic Industrial Locations, which exceeds the target set out in the Local Plan. There was a significant loss within Office Clusters, particularly in the Orpington Office Cluster, with one application seeing a loss of 1,229sqm of floorspace through permitted development.

Table 4: Anticipated change in designated B Class floorspace (sqm)<sup>13</sup>

Designation	Approximate Floorspace (sqm)	Applications	Permissions involving Change of Use/Floorspace	Loss/Gain B Use Class Floorspace (sqm)
Strategic Industrial Location	467,100	7	3	+519
Locally Significant Industrial Sites	401,340	8	3	-867
Office Clusters	39,430	6	2	-1,377

#### <u>Indicator 4.3: Employment floorspace on previously developed land (sqm)</u>

Table 5: Floorspace Granted Permission on Previously Developed Land

<b>Employment Use Class</b>	Floorspace Change (+/-) (sqm) on Previously Developed Land (Net)
B1 (Business)	-10,527
B2 (General Industrial)	+245
B8 (Storage/Warehousing)	-2,214

- 2.55 In 2020/21, there were 46 B Use Class permissions (both gains and loss of floorspace). The floorspace granted permission is distributed widely across the Borough.
- 2.56 Based on these permissions, there has been a net loss of floorspace across all B Use Classes. The loss of a substantial amount of B1 floorspace can be attributed to the conversion of office to residential use under permitted development rights. Two notable applications include Yeoman House (20/03671/RESPA) for a change of use from office

<sup>13</sup> These figures are based on extant permissions recorded on the PLD and are not completions figures.

- to form 57 residential units resulting in a loss of approximately 4,368sqm, and the Registry (20/01276/RESPA) for a change of use from office to form 101 residential units resulting in a loss of approximately 2,900sqm.
- 2.57 In relation to the loss of B8 floorspace in the Borough, there were not any comprehensive developments, instead several small developments accumulated losses.

#### Indicator 4.6: New permanent "Forms of Entry (FE)" provided

2.58 This indicator covers the plan period and there may be some monitoring periods where no new permanent 'forms of entry' are provided. The relevant information was not provided for this financial year and will be reported in future AMRs.

### **Design and Public Realm**

#### Indicator 5.1: Completion of public realm projects

2.59 This indicator covers the plan period and there may be some monitoring periods where no projects are completed. The relevant information was not provided for this financial year and will be reported in future AMRs.

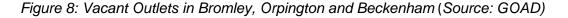
#### **Town Centres**

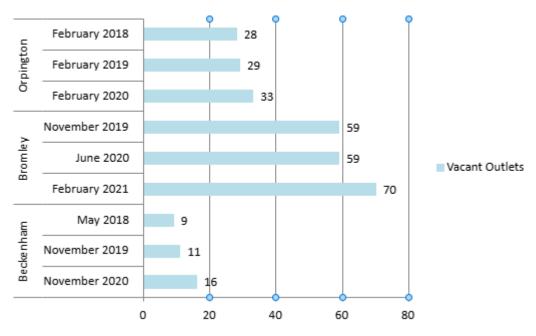
2.60 The Borough's town centres continue to be important for attracting a wide range of residents and visitors for shopping, leisure, and dining. The shopping hierarchy for the Borough's established centres has evolved over a considerable period of time and is recognised in the London Plan 2021. The centres are classified according to their existing role and function, and each performs a different but complementary role. The hierarchy is important in providing a range of services and facilities across the Borough.

Table 6: Bromley's Retail Hierarchy

Centres	Retail Hierarchy
Bromley	Metropolitan Centre
Orpington	Major Town Centre
Beckenham	District Centre
Petts Wood	
Crystal Palace	
Penge	
West Wickham	
Biggin Hill	Local Centre
Hayes	
Mottingham	
Chislehurst	
Locksbottom	

#### Indicator 6.1: Number of vacant units (by centre)





- 2.61 The GOAD 'Centre Reports' show how Bromley's town centres have fared in recent years in relation to vacant retail outlets. There has been a consistent increase in vacant units over the past five years. Fluctuations observed over the last two financial years could have been contributed to because of the pandemic.
- 2.62 Whilst Beckenham and Orpington have seen a consistent decrease in vacant units over the past five years, in 2020/21 Orpington had four additional vacant units. Bromley also saw an increase of 11, but vacant units in Bromley Town Centre have tended to fluctuate in recent years.
- 2.63 Combining this data with recent trends in footfall in Bromley, Orpington, and Beckenham Town Centres (set out in Table 7) may give a better indication of activity on the Borough's High Streets. Pedestrian flows, or 'footfall,' are key indicators of the vitality of town centres. There is no footfall data available for 2020/21.

#### Indicator 6.2: Footfall (by centre)

Table 7: Footfall Counts in Bromley, Orpington and Beckenham (March 2021)

	2016/17 <sup>14</sup>	2017/18	2018/19	2019/20	2020/21
Bromley	78,540	114,396	109,044	Unavailable*	Unavailable*
Beckenham	25,698	23,478	29,766	Unavailable*	Unavailable*
Orpington	33,426	24,428	24,270	Unavailable*	Unavailable*

Table 8: Net Retail Floorspace Lost in 2020/21

Use Class	Net Floorspace Lost (sqm)
A1	1,405

2.64 Of 8 applications recorded relating to A1 floorspace, 4 resulted in a net loss. Approximately 1,400sqm was lost to Change of Use to C3.

#### **Built Heritage**

## Indicator 7.1: Number of listed buildings demolished/part demolished

2.65 No permissions were permitted in 2020/21 that involved the demolition/part demolition of a listed building, which meets the target set out in the Local Plan.

## **Transport**

#### Indicator 8.1: Completion of transport projects (as outlined in Infrastructure Delivery Plan)

2.66 This indicator covers the plan period and there may be some monitoring periods where no projects are completed. An updated IDP was published in November 2020<sup>15</sup> as part of the Bromley Community Infrastructure Levy (CIL) Draft Charging Schedule consultation. No transport projects identified in the IDP were completed in 2020/21.

### **Environmental Challenges**

#### Indicator 9.1: Amount of local authority collected waste arising and managed by type

Table 9: Amount of local authority collected waste arising and managed by type (in tonnes)

Amount of local authority collected waste arising and managed by type (in tonnes)					
Household waste Non-household Total waste					
Local authority collected waste	135,375	19,114	154,489		
Waste sent for recycling	60,610	371	60,981		

<sup>&</sup>lt;sup>14</sup> Footfall counts were carried out over a one-day period instead of a two-day period as in previous AMRs.

https://www.bromley.gov.uk/download/downloads/id/6468/london\_borough\_of\_bromley\_infrastructure\_delivery\_plan.pdf

<sup>&</sup>lt;sup>15</sup> Available here:

Dry recycling	30,673	371	31,044
Composting	29,937	0	29,937
Recycling rate	45%	2%	39%
Inert waste			381
Landfill			8,925
Incineration (waste			83,198
to energy)			

2.67 Table 9 shows the total amount of local authority collected waste arising and managed by type. The recycling rate in 2020/21 was just under half for household waste, which was a decrease from 2019/20.

Indicator 9.2: Major applications with Sustainable Urban Drainage Systems, and s106 agreements for drainage and flood risk infrastructure

2.68 S106 information shows there were no agreements signed in 2020/21 which included provision for drainage and flood risk infrastructure. However, a requirement for details of site-specific drainage schemes was routinely imposed as a condition on relevant schemes.

<u>Indicator 9.4: Major developments meeting and exceeding carbon reduction targets, and monies from the carbon off-setting fund spent on local projects</u>

2.69 S106 information shows three agreements<sup>16</sup> were signed in 2020/21 with a carbon offsetting financial contribution, totalling approximately £371,000. These agreements included residential and non-residential development, both major and minor permissions.

Indicator 9.3: Number of applications approved for development of contaminated land

Indicator 9.5: Capacity of renewal energy installations incorporated into major developments

<u>Indicator 9.6: Increased use of decentralised energy networks</u>

2.70 Data could not be sourced to effectively monitor these indicators in 2020/21. The Council will explore ways to access reliable data for future AMRs.

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<sup>&</sup>lt;sup>16</sup> Planning permission references: 19/03683/OUT, 20/01288/OUT, 20/02697/FULL1

# **Appendices**

# Appendix 1: progress against Local Development Scheme 2020 indicative timetable (as of end of the monitoring period)

Title of Development Plan Document	Role and Content	Geographical Coverage	Start evidence base gathering ; Local Plan SA scoping	Regulation 18 consultation	Regulation 19 consultation	Submission to Secretary of State	Examination	Adoption	Comments
Review of the Bromley Local Plan	Review of the adopted Local Plan to take into account changes to national and regional planning policy and to reflect changes in the local area, where necessary	Borough-wide	Late 2020 for start of evidence base gathering; Mid to late 2021 for Sustainabi lity Appraisal scoping	Late 2021 to early 2022	Late 2022	Early 2023	Mid 2023	Late 2023 to early 2024	At the time of writing, the Council is considering options for taking forward the Local Plan review in line with the indicative timetable.

Title of Supplementary Planning Document	Role and Content	Geographical Coverage	Consultation on Draft SPD	Adoption	Comments
Planning Obligations SPD	To provide details on the Council's requirements relating to planning obligations, including details of how affordable housing will be secured and delivered. The SPD will replace the current Planning Obligations SPD and Affordable Housing SPD once adopted. Publication of the SPD will be aligned with the adoption of the Borough CIL, which will reduce the need for a number of obligations identified in the current Planning Obligations SPD.	Borough-wide	Early 2021	Mid 2021	The Council plans to align update of the SPD with the adoption of a local CIL charge; the indicative timetable remains accurate.
Bromley Design SPD	To provide guidance on key design and sustainability principles for new development in the borough. Upon adoption, the SPD will replace extant supplementary planning guidance set out in the General Design Principles SPG and Residential Design Guidance SPG.	Borough-wide	Mid to late 2021	Early to mid-2022	No work progressed to date, but indicative timetable remains accurate.
Bromley Town Centre SPD	To provide guidance on the implementation of policy and site allocations in Bromley Town Centre	Bromley Town Centre	Late 2020 to early 2021	Early to mid-2021	Initial consultation was undertaken in summer/autumn 2020. This will inform the draft SPD. The indicative timetable remains accurate.
Orpington Town Centre SPD	To provide guidance on the implementation of policy and site allocations in Orpington Town Centre	Orpington Town Centre	Late 2020 to early 2021	Early to mid-2021	Initial consultation was undertaken in summer/autumn 2020. This will inform the draft SPD. The indicative timetable remains accurate.

#### Appendix 2: Bromley local intermediate income thresholds methodology

- 1. To establish an upper limit gross income threshold for intermediate ownership housing, it was considered that finding the midpoint between social-rented unit capitalised values and lower quartile house prices would be appropriate to establish a value upon which to work out the income level (see Table A2.1 below).
- 2. Social rented capitalised values and lower quartile house prices from 2017 were used as a basis for the calculations, and then uplifted. These values were used the last time local intermediate income levels were updated in 2018.
- 3. The following uplifts were used based on information from the Office for National Statistics UK House Price Index relating to annual house price increases:
  - 2017 10%
  - 2018 3.5%
  - 2019 1%
  - 2020 2.2%
  - 2021 8.8%

Table A2.1: Gross salary required to access intermediate ownership prices by unit size.

	Social rented capitalised value uplifted from 2017-2021	Lower quartile house prices uplifted from 2017-2021	Midpoint between social rented capitalised values and lower quartile house prices	Gross salary required to access midpoint (midpoint/4)	Monthly housing costs (40% net household income based on gross salary)
1 bed unit	£182,145	£300,787	£241,466	£60,367	£1,437
2 bed unit	£227,810	£375,984	£301,897	£75,474	£1,723
3 bed unit	£242,975	£401,050	£322,012	£80,503	£1,818
4 bed unit	£258,139	£525,746	£391,942	£97,986	N/A

- 4. The GLA advise that for dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40%<sup>17</sup> of net household income. These monthly housing costs are set out in Table A2.1.
- 5. The GLA upper limit of £90,000 is considered applicable for 4+ bedroom units in light of the fact that the annual income threshold is calculated at £97,986.

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<sup>&</sup>lt;sup>17</sup> London Plan 2021, paragraph 4.6.9

6. Table A2.2 illustrates that current share to buy units could be accessed on the suggested income ranges based on 40% net income being available for annual housing costs, including rent and service charges.

Table A2.2: Examples of current Borough intermediate housing schemes (new and resale) and how reviewed income levels relate to monthly outgoings<sup>18</sup>

	Location	Full Price	Share price (and min share)	No. bedrooms	Estimated monthly cost (mortgage, rent and service charge)	40% net threshold income
1	Varney Court 10 St Marks Sq BR2 9YD	£360,000	£126,000 (35%)	1	£1,268	£1,437
2	Foxgrove Manor Foxgrove Road BR3 5DB	£500,000	£125,000 (25%)	1	£1,510 (exceeds 40% net income)	£1,437
3	Beck Gardens Langley Court BR3 3AT	£355,000	£88,750 (25%)	1	£1,202	£1,437
4	Marta Rose Court 188 Croydon Road SE20 7YU	£270,000	£148,500 (55%)	1	£1,169	£1,437
5	Lawrie House Crystal Palace Park Road SE26 6UG	£394,000	£137,900 (35%)	1	£1,405	£1,437
6	315 High Street BR6 0NN	£275,000	£68,750 (25%)	1	£956	£1,437
7	Foxgrove Manor Foxgrove Road BR3 5DB	£500,000	£125,000 (25%)	2	£1,582	£1,723
8	Hardwick House Masons Hill BR2 9GW	£350,000	£140,000 (40%)	2	£1,441	£1,723
9	Halligans Court 12B Cowper Road BR2 9RX	£330,000	£132,000 (40%)	2	£1,097	£1,723
1	Beck Gardens Langley Court BR3 3AT	£435,000	£108,750 (25%)	2	£1,465	£1,723
1	Flat 3 Delta Court 94 Worsley Bridge Road SE26 5FL	£460,000	£115,000 (25%)	2	£1,449	£1,723
1 2	Standcumbe Court 166 Upper Elmers End Road BR3 3DY	£365,000	£164,250 (45%)	2	£1,294	£1,723
1	Beck Gardens Langley Court BR3 3AT	£585,000	£146,250 (25%)	3	£1,909 (exceeds 40% net income)	£1,818
1 4	Flat 12 Delta Court 94 Worsley Bridge Road SE26 5FL	£530,000	£132,500 (25%)	3	£1,656	£1,818

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<sup>&</sup>lt;sup>18</sup> Source: <a href="http://www.sharetobuy.com/">http://www.sharetobuy.com/</a>, June 2022