

London Borough of Bromley

Report No.
ELS05031

PART 1 - PUBLIC
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Agenda
Item No.

XX

Title: **DRAFT SUPPLEMENTARY PLANNING GUIDANCE ON HOUSING PROVISION (DECEMBER 2004)**

Decision Maker: **Development Control Committee** Decision Date: **08 Feb 2005**

Decision Type: Non-Urgent Non-Executive Key

Budget/Policy Framework: Within policy and budget

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Ward: All Wards

1. SUMMARY

- 1.1 The GLA have produced a draft Supplementary Planning Guidance (SPG) document on Housing Provision (December 2004) for consultation purposes. The document covers a number of issues including; policy context, current housing provision targets, maximising housing capacity, sustainable residential quality, efficient use of stock, large and small sites, promoting mixed use development and housing choice. A number of these issues have been considered below and observations made on the content of the document to feed back to the GLA.
- 1.2 The SPG is attached at Appendix 1 for information or can be accessed at http://www.london.gov.uk/mayor/strategies/sds/housing_provision.jsp

2. RECOMMENDATIONS

- 2.1 Members are asked:
 - (i) to consider any further comments on the proposed draft SPG;
 - (ii) to endorse the report as the basis of the Council's response to the GLA's consultation.

3. COMMENTARY

3.1 The purpose of the draft supplementary planning guidance (SPG) is to provide additional guidance on the implementation of existing policies on housing provision in the London Plan that was published in February 2004. The policies set out below in the London Plan deal with issues relating to housing provision:

- 3A.1 Increasing London's supply of housing (page 54);
- 3A.2 Borough housing targets (page 55);
- 3A.3 Efficient use of stock (page 58);
- 3A.4 Housing choice (58);
- 3A.5 Large residential developments (page 59);
- 3A.10 Special needs and specialist housing (page 67);
- 3A.11 London's travellers and gypsies (page 68);
- 3A.12 Loss of housing and affordable housing (page 68);
- 3A.13 Loss of hostels, staff accommodation and shared accommodation (page 68);
- 3B.4 Mixed use development (page 90);
- 4B.1 Design principles for a compact city (page 156);
- 4B.3 Maximising the potential of sites (page 158).

3.2 The draft SPG does not set out additional policies but seeks to assist Boroughs in reviewing UDPs, preparing Local Development Documents and assessing planning applications. Paragraph 1.2 of the draft SPG states that it will also be a material consideration when determining planning applications. The guidance also aims to assist developers, landowners and others when considering or preparing planning applications for residential development.

3.3 Set out below are some of the key issues that the SPG addresses and comments on these aspects that will form the formal response to the GLA.

Introduction – London's need for new housing (page 6).

3.4 Paragraph 2.1 sets out the fact that London is experiencing rapid population growth and that the London Plan includes strategic policies to accommodate and support this growth in a sustainable way. Paragraph 2.2 specifies that Boroughs will have to identify new housing opportunities and sources of supply on brownfield sites in sustainable locations.

3.5 Paragraph 2.3 specifies that significant new housing in London will be built at higher than traditional development patterns. It is considered that reference needs to be made within this paragraph that such new housing development should not adversely impact upon the residential amenity of surrounding occupiers, should respect the existing character of residential areas and should provide good quality living accommodation for prospective occupiers.

Government planning policy

3.6 Paragraph 2.7 makes reference to Government guidance published in July 2003 on the need to review designated employment land in light of them contributing to possible sites for housing or mixed-use purposes. This guidance was reported to Development Control

Committee on 14 October 2003 and the results of the consultation are likely to be incorporated within any revised PPG3 in the near future. Paragraph 2.7 of the SPG highlights the need for the Borough to continue to review existing designated business areas to protect their designation under policy EMP4 of the Revised Deposit UDP where appropriate, and to ensure that an adequate supply of business land is retained within these areas in light of the fact that the demand for business units is relatively high in Bromley.

- 3.7 This also applies to paragraph 9.16 of the SPG that deals with recycling industrial land. Reference should be made in 9.16 to the need for proposals for a change of use from industry to residential, in areas not specifically designated for business, to be accompanied by adequate evidence to support the fact that the use is no longer viable (see para 3.19 below) as set out in policies EMP7 and H13 of the Revised Deposit UDP (Sep. 2002).

Regional Context

- 3.8 Paragraph 2.9 of the draft guidance makes reference to the London Plan's 'target' of 30,000 new homes per annum across London. Importantly, it is necessary to ensure that reference is made here to the outcome of the London Housing Capacity Study (LHCS) 2004 results that are likely to be produced in summer 2005. These results will give an indication of whether or not the figure of 30,000 new homes per annum across London is actually achievable. It is noted and supported that reference is made to the LHCS in paragraph 3.5 of the SPG.

Maximising Housing Capacity

- 3.9 Support is given to paragraphs 4.1 and 4.2 that emphasise the need to make the best use of available sites, including mixed-use sites and development opportunities especially within areas that are easily accessible by public transport, in addition to the need for high standards of design and construction. Paragraph 4.3 specifies the importance of maximising potential in light of the need to successfully absorb increased population and jobs in London over the next 10-15 years. The second sentence of the paragraph should be expanded to make reference to the importance of new proposals demonstrating how they relate in design terms to existing uses, occupiers and the character of established areas.
- 3.10 It is considered that paragraphs 4.4 to 4.12 should emphasise further that housing density is just one measure of expressing the amount of residential accommodation in a specific area, and importantly one of the key aims for new residential developments is to provide good quality living accommodation for prospective occupiers and existing surrounding occupiers whilst demonstrating that the best use of sites has been made.
- 3.11 Paragraph 4.8 recognises that importance should be placed upon the provision of accommodation for families. This emphasises the need for more two+ bedroom units which could impact upon the realisation of the densities set out in Table 4B.1 of the London Plan.
- 3.12 With regard to paragraph 4.11 playspaces for younger and older children should be provided in family housing schemes as a vital part of making the development sustainable (especially in light of increased densities and reduced amenity space). Planning is an important delivery vehicle for the Mayor's "Children & Young Peoples Strategy" and the "Draft Guidance to Preparing Play Strategies" (August 2004).

Sustainable Residential Quality

- 3.13 Support is given to paragraphs 5.1 – 5.4 that highlight the need to take into account numerous factors (location, management, occupancy and tenure) when assessing a new residential proposal and that Table 4B.1 of the London Plan should be used as a guide as opposed to an absolute rule. Paragraph 5.6 of the SPG specifies that Boroughs should adopt the residential density ranges in Table 4B.1 and importantly the table should not be seen as prescriptive but applied flexibly in light of local circumstances.
- 3.14 Paragraphs 5.14 - 5.15 set out the need for an integrated approach in terms of good design of new developments to help reduce the area allocated for car parking, whilst taking into account location, access to public transport and scope for higher density development. The guidance specifies that this can result in a higher quality living environment. Support is given to paragraph 5.18 that states in suburban areas off-street rather than on-street parking may be desirable (e.g. on bus routes or along narrow roads). This is in accordance with the maximum standards set out in the Revised Deposit Plan (September 2002) that require off-street parking relating to public transport accessibility. It would be beneficial to make reference to the need for developers or applicants to submit detailed Transport Assessments where proposals are likely to be significant generators of travel and to enter into agreements to draw up Travel Plans where appropriate.
- 3.15 Reference is made to car-capped or car-free developments in paragraph 5.17. This should also refer to the need for spatial standards of accommodation in such proposals to be relatively high as it is likely that such sites would be within highly accessible locations and accommodate limited amenity space. Higher spatial standards could result in the quality of the living accommodation being improved.

Loss of Housing

- 3.16 Paragraph 6.19 specifies that Boroughs should resist the loss of housing units. It is important to make reference in paragraph 6.19 that there may be circumstances where a net loss of housing is appropriate. For example policy H1 of the Revised Deposit UDP (Sep 2002) specifies that the Council will seek to make for provision additional housing by:
- “(ii) Resisting the loss of housing by change of use, except in cases where the accommodation is unsuitable for continued residential use, with or without adaptation, or where the proposal meets an identified need for community facilities;”

Large development sites

- 3.17 Paragraph 7.4 of the SPG specifies that large development sites (not just those over 500 dwellings) can have an immediate impact on infrastructure capacity and requirements (i.e. education, health and amenity provision) that is supported. Reference should be made in this paragraph to the need to secure related planning gain via a legal agreement or a planning condition where appropriate.
- 3.18 Paragraph 7.5 makes reference to trigeneration technology and this is the only reference in this section to sustainable methods of design and construction. It would be advantageous to make reference here to the fact that this area will be dealt with in the Sustainable Design and Construction SPG or to expand this paragraph to incorporate some general guidance on the need for new developments to incorporate measures for recycling, energy efficiency, renewable energy generation and water efficiency as set out in the London Plan.
- 3.19 Paragraph 7.6 of the guidance makes reference to the London Housing Capacity Study (LHCS) 2004 (also mentioned in para 3.5). It is important to stress that only brownfield

sites over 0.5 ha have been included in the study to assess if they are suitable for housing purposes or not and all other sites have been excluded (Green Belt, Metropolitan Open Land, Areas of Outstanding Natural Beauty, Urban Open Space, Sites of Special Nature Conservation Interest and sites below 0.5ha). There is concern that paragraph 7.6 states that the LHCS should be “complemented by a much more rigorous and comprehensive identification of large housing sites in LDFs..”. It is considered that the LHCS exercise of identifying sites was supposed to be very comprehensive and rigorous and include all large sites over 0.5ha and therefore clarification is needed in this paragraph on what other large sites the GLA would expect to come forward.

Residential Conversions and Flats above Shops

- 3.20 Paragraphs 8.2-8.5 are noted. Paragraphs 8.6 and 8.11 state that there may be a case for the reconversion of some non-residential uses. It is important to stress that in the case of community facilities there should not be a net loss in facilities and where applications are sought for the conversion of office space back to residential, or from retail to residential for example, evidence should be provided to support the fact that the use is not viable (i.e. through marketing evidence for the use over an 18 month period). With regard to the conversion of previous retail units, emphasis should be placed on the need to ensure that the vitality and viability of centres is not jeopardised.

Recycling industrial land

- 3.21 In addition to the comments made above, reference should be made in para 9.20 to the need to ensure the residential amenity of prospective occupiers is not compromised by the nature of any surrounding existing business uses and therefore the need for sites to be suitable generally for residential purposes.

Housing Choice

- 3.22 It is noted in paragraph 10.3 of the SPG that the future overall demand in London for 2/3 bedroom units is 38% and the demand for 4 bedroom or larger households is 30%. For social housing units the demand for 2/3 bedroom units is 38% and the demand for 4 bedroom or larger units is 41%. These proportions relate to an assessment of London-wide requirements for housing relative to supply including the projected future supply from the relet and resale of existing stock and vary widely between local areas (paragraph 10.4 SPG). Importantly though they are a useful regional background to local housing needs requirements and housing market studies but should not be applied at local authority or site level.
- 3.23 Emphasis is placed on the need for borough level guidance on housing mix to be based upon an up to date housing needs assessment. Where capacity on site is insufficient to meet all projected housing demand there is a need to ensure the mix promotes mixed and balanced communities and to take a judgement on the priority to be given to different forms of provision that can relate to borough statutory homelessness duties.
- 3.24 Support is given to the need for Boroughs to ensure that a full range of housing needs are met as set out in paragraphs 10.9-10.17 of the SPG. In addition to this it would be advantageous to provide some specific guidance on the need for units to be built to Lifetime Homes standards or make reference to the GLA SPG on Accessibility.

4. POLICY IMPLICATIONS

- 4.1 The SPG will provide additional guidance on the implementation of policies within the London Plan dealing with housing provision.

Non-Applicable Sections:	Financial Legal Personnel
Background Documents: (Access via Contact Officer)	SPG Housing Provision (GLA, December 21004) Revised Deposit UDP September 2002 The London Plan (February 2004)