

**Decision Maker:**        **Development Control Committee**

**Date:**                    **28<sup>th</sup> June 2012**

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

**Title:**                    **Living in Bromley – Housing Options**

**Contact Officer:**        Stephanie Turner, Planning Officer  
Tel: 020 8313 4477    E-mail: Stephanie.turner@bromley.gov.uk

**Chief Officer:**        Chief Planner

**Ward:**                    All Wards

---

**1. Reason for report**

1.1 The Local Development Plan Advisory Panel (LDPAP) agreed in May that work undertaken in preparation of the Core Strategy will be incorporated into a Bromley Local Plan to comply with the Government's Planning Reforms. This report sets out the preferred strategy and options in relation to housing, which will form the major part of the Living in Bromley section of the Local Plan. Development Control Committee is asked to agree the policy approach set out in this report for incorporation in the Local Plan Options and Preferred Strategy Consultation document. The Executive will be asked to agree this document for consultation in the early autumn.

---

**2. RECOMMENDATION(S)**

Development Control Committee is asked to agree that the policy options as set out in this paper be incorporated in the Local Plan Options and Preferred Strategy Consultation document.

### Corporate Policy

1. Policy Status: New Policy:
  2. BBB Priority: Excellent Council Quality Environment Safer Bromley Vibrant, Thriving Town Centres:
- 

### Financial

1. Cost of proposal: Not Applicable:
  2. Ongoing costs: Not Applicable:
  3. Budget head/performance centre: Planning and Renewal Budget
  4. Total current budget for this head: £2.0m
  5. Source of funding: Existing Revenue Account 2012/13
- 

### Staff

1. Number of staff (current and additional): 74ftes
  2. If from existing staff resources, number of staff hours:
- 

### Legal

1. Legal Requirement: Statutory Requirement:
  2. Call-in: Not Applicable:
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough wide
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Views are being invited
2. Summary of Ward Councillors comments: Comments will be reported orally to the Committee

### 3. COMMENTARY

3.1 The London Borough of Bromley is the largest borough in London with an area of 15,014 hectares, half of which is designated as Green Belt. Bromley's distinctive character arises from its protected open space: countryside, parks, gardens, playing fields, and woodlands spread throughout the Borough. These existing open space designations restrict the number of large sites which can come forward for housing. The Borough's housing target is therefore very much capacity led having regard to the existing land designations and policy constraints.

3.2 This paper deals with the housing aspects of the "Living in Bromley" chapter. Other important aspects around living in Bromley including, education, health and crime will be covered at a later meeting. Options around Gypsies and Travellers will be outlined in a separate document on the agenda but will be incorporated ultimately in this chapter.

#### **Policy Options**

3.3 Vision

*"A range of decent homes of different types and sizes are available and housing supply is tailored to local needs. Any new housing complements and respects the character of neighbourhood in which it is located, paying particular attention to the density of development, parking requirements and improving the choice of accommodation available."*

3.4 Objectives

- Ensure there is an appropriate supply of homes to meet the varied needs of the local population, which responds to changing demographics, in particular as the population ages.
- Ensure new residential development and conversions complement and respect local character.
- New homes are designed to minimise environmental impact and are supported by appropriate social and environmental infrastructure.

#### **National and London Plan Policies**

3.5 The National Planning Policy Framework (NPPF)

3.5.1 The NPPF requires Local Authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

3.5.2 Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

3.5.3 The NPPF sets out that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

### 3.6 London Plan

3.6.1 The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford (Policy 3.3). Boroughs should seek to achieve and exceed the relevant minimum borough annual average target.

3.6.2 Policy 3.4 of the London Plan seeks to optimise housing output taking account of local context and character, design principles and public transport capacity. Importantly Policy 3.5 of the London Plan states that housing developments should be of the highest quality internally and externally and in relation to their context and to the wider environment taking into account the strategic policies in the London Plan to protect and enhance London's residential environment and the attractiveness as a place to live.

3.6.3 The London Plan at Policy 3.8 states that account should be taken of the changing age and structure of London's population and in particular, the varied needs of older Londoners, including for supported and affordable provision. It also requires that all new housing is built to 'Lifetime Homes' standards and that ten percent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

3.6.3 Boroughs are required to set an overall target in their plans for the amount of affordable housing provision needed over the plan period in their areas and separate targets for social rented and intermediate housing. Boroughs should also reflect the strategic priority accorded to the provision of affordable housing. The London Plan states that affordable housing targets may be expressed in absolute or percentage terms.

3.6.4 The London Plan states that it is expected that new development in London will seek to achieve the highest possible Code for Sustainable Homes Levels possible. The London Housing strategy outlines the minimum Code for Sustainable Homes levels required for publicly funded housing developments and sets out the requirement to meet Code Level 4 from 2011.

### **Strategic policy options (preferred options are shaded in grey)**

### 3.7 Housing Supply

3.7.1 The London Plan states that boroughs should seek to achieve and exceed the relevant minimum borough annual average target. Bromley's annual housing target as set out in the London Plan is 500 units per annum.

3.7.2 It is anticipated that an early review of the Strategic Housing Land Availability Assessment (SHLAA) (from which the Council's target of 500 units per annum has arisen) will take place and could result in a more realistic long term target for the Council. The integrity of Bromley's Green Belt, Metropolitan Open Land, Urban Open Space, size, bulk and design of residential buildings and garden land should be reflected in any assessment of the capacity of the Borough to accommodate further growth.

3.7.3 In anticipation of the SHLAA review the Council submitted a more realistic target in the region of 470 units per annum in response to the London Plan consultation having regard to the likely delivery of the SHLAA sites, density and local character.

## **Options:**

**Option 1A.1** seek to achieve the current London Plan target of 500 units per annum.

**Option 1A.2** seek to significantly exceed current London Plan targets.

Housing development in recent years (averaging at over 650 homes per annum over the last 5 yrs) has led to concerns about the changing character of the Borough's residential areas. Development planned for the next five years could average 500 units per annum, distributed across large allocated and 'windfall' sites in addition to small sites.

**Option 1A.3** seek to achieve a more realistic target in the region of 470 in anticipation of the forthcoming review of the SHLAA having regard to the local character and context and delivery of existing identified sites. This is considered a more realistic long term target for the Borough.

Large scale release of open space is not considered as an option as it is contrary to local, regional and national policy. The intensification of areas outside of the town centre is not considered a sustainable option as it will have a detrimental impact on the character of the Borough. The provision of a significantly lower number of houses would be contrary to regional and national policy and is therefore not considered an option.

## **3.8 Location**

3.8.1 A large proportion of new housing in Bromley is built on existing brownfield sites. Bromley is required to identify and seek to enable development capacity to be brought forward to meet the housing targets having regard to the potential to realise brownfield housing capacity through the spatial structure it provides including;

- Intensification
- Town centre renewal
- Opportunity and intensification areas and growth corridors
- Mixed use redevelopment sensitive renewal of existing areas

**Option 2A.1** Intensification of existing areas at a higher density.

As noted above this may not be sustainable in the long term as it will have a detrimental impact on the character of the Borough.

**Option 2A.2** Town centre first approach.

Town centres are considered the most accessible locations. This approach would assist in town centre renewal and would help to retain the character of the rest of the Borough.

**Option 2A.3** Existing brownfield sites & windfall sites at a density that respects local character. As noted above this may result in some developments coming forward at densities lower than that as set out in the London Plan Density Matrix and some coming forward at higher densities.

**Option 2A.4** Protection of Residential gardens.

The use of previously developed land is encouraged but land in built up areas, including private residential gardens, is not considered to be previously developed. Inappropriate development of residential gardens should be resisted where development would cause harm to the local area.

**Option 2A.5** Renewal of existing areas.

The London Plan identifies some Areas of Regeneration within the Borough that could benefit from regeneration development. This could include additional housing provision or the

improvement of existing homes. Other areas outside those defined in the London Plan may also benefit from renewal.

Other associated improvements in these areas could include transport, learning, health, safety, access, employment and environment.

### **3.9 Quality / Design**

3.9.1 The design of all new housing developments should enhance the quality of local places taking into account: physical context, local character, density, tenure, and land use mix. The Borough is required to incorporate minimum space standards that generally conform with the minimum space standards as set out in the London Plan.

**Option 3A.1** All new development to be built to respect and enhance/improve the existing local character.

This may result in some developments coming forward at densities lower than that as set out in the London Plan Density Matrix and some coming forward at higher densities i.e. optimising housing potential in accordance with Policy 3.4 of the London Plan.

**Option 3A.2** All new developments to be built in accordance with the London Plan density Matrix unless there are convincing environmental or local character arguments for an alternative density.

This is not a preferred option to be applied across the whole Borough as it will have a detrimental impact on the character of the Borough. The density Matrix is intended to be used as a guide.

**Option 3A.3** All private new homes should be built to achieve Code for Sustainable Homes Level 4.

In the past, the Code for Sustainable Homes Level 4 has only been applied to the affordable housing element of new developments, but the London Plan encourages the highest code possible for all new housing development.

### **3.10 Housing Type**

3.10.1 The London Plan states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments should offer a range of housing choice in terms of mix of housing sizes and types.

3.10.2 Boroughs are required to set an overall target in the LDF for the amount of affordable housing provision needed over the plan period in their areas and separate targets for social rented and intermediate housing. Boroughs should also reflect the strategic priority accorded to the provision of affordable housing. The London Plan states that affordable housing targets may be expressed in absolute or percentage terms.

#### **Affordable Housing**

**Option 4A.1** 50% target for large sites.

A 50% Borough wide target is not considered a viable target having regard to evidence from the Council's Affordable Housing Viability Assessment.

**Option 4A.2** 40% Borough wide target on large sites.

The evidence from the Affordable Housing Viability Assessment (AHVA, June 2010) suggests that this may be an option for the Council to consider.

**Option 4A.3** Retain the existing 35% target on large sites.  
This is the existing target in the adopted Unitary Development Plan.

**Option 4A.4** Numerical target.  
It would be difficult to forecast a numerical target for the Borough as affordable housing is only being sought on larger sites (10 units and above).

**Option 4A.5** Increase affordable housing target and therefore provision in some areas and decrease in others.  
The AHVA evidence demonstrates that it may be difficult to set a different target level for different postcode areas due to the varying land values within those areas.

Nb the above targets in options 4A.1 to 4A.3 are based on a percentage of habitable rooms on a site.

### 3.11 Other specific housing needs

3.11.1 Approximately 8,500 Bromley residents are vulnerable or disabled people receiving social care services and there are particular pressures to support more young disabled people reaching adulthood with significant care needs (Core Strategy Issues Document 2011).

3.11.2 Bromley has a larger proportion of people aged 85 and over than any other London Borough. As the number of people aged over 85 in Bromley grows there will be increasing pressure on the provision of services for older people and the appropriateness of their accommodation (Bromley Adult and Community Services Portfolio Plan 2011/2012).

3.11.3 As noted above, the London Plan requires all new housing to be built to Lifetime Homes standards and it also requires that ten percent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

**Option 4A.6** Encourage homes to be designed to meet the particular needs of the borough such as housing for older people or wheelchair accessible housing.

**Option 4A.7** Encourage the provision of family homes (i.e. 3 bed or larger).

## 4. POLICY IMPLICATIONS

The options and preferred options will be incorporated into the Local Plan consultation. Once Local Plan is adopted planning law requires that applications for planning permission must be determined in accordance with the Development Plan (which includes the Local Plan).

<b>Non-Applicable Sections:</b>	Legal Implications Personnel implications Financial Implications
Background Documents: (Access via Contact Officer)	Core Strategy Issues Document – consultation response DCC 17/11/2011