

5. Living In Bromley

Introduction

This section takes forward the preferred options in the Living in Bromley section of the Options and Preferred Strategy consultation document, in light of responses, changes in Government guidance and the London Plan.

Background

The NPPF specifies that the purpose of the planning system is to contribute to the achievement of sustainable development. The planning system plays an important social role by supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being. Additional economic and environmental roles are mutually dependent on the latter.

Nationally, there is a presumption in favour of sustainable development and local planning authorities should seek opportunities to meet development needs of their area and meet objectively assessed needs (including identifying key sites critical to the delivery of the housing strategy over the plan period) with sufficient flexibility to adapt to rapid change. Alongside this is the need to take account of the different roles and character of different areas, promote the vitality of urban areas, protecting the Green Belt and encourage the effective use of land by reusing land that has been previously developed.

Housing

Draft Policy - Housing Supply

The Council will make provision for at least 470 additional homes per annum over the fifteen year Plan period which will be facilitated by:

The development of Proposal Sites;

Town centre renewal involving the provision of housing;

The development of housing within Renewal Areas where appropriate;

The development or redevelopment of windfall sites;

The conversion of suitable properties;

Mixed use developments including housing in suitable locations;

The provision of suitable non self-contained units;

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Vacant properties being brought back into use;

Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities.

Supporting text

The London Plan Policy 3.3 provides a regional context for housing requirements whilst setting out Borough figures for housing provision from 2011/12 – 2020/21 based on the findings of the London-wide Strategic Housing Land Availability Assessment/Housing Capacity Study 2009 and the Strategic Housing Market Assessment and other analysis. An annual total net requirement figure of 34,900 units is seen as an appropriate monitoring figure for London. The Borough has an annual housing provision figure of 500 units per annum as set out in Table 3.1 of the London Plan to assist in meeting requirements across London. The 2009 SHLAA specifies provision of approximately 305 units per annum on large sites (0.25 ha and larger) and 195 units on small sites. The figure for housing provision will be rolled forward over a 15 year period in line with advice set out in the London Plan and the GLA's Housing SPG 2012.

The Council maintains that 470 units per annum is a sustainable minimum housing figure.

Boroughs should enable development capacity to be brought forward to meet targets whilst having regard to other policies in the Plan (i.e. development on brownfield land, intensification, town centre renewal, opportunity areas, mixed use, renewal of existing residential areas). New sites should be identified and existing sites reviewed to enable targets to be met.

The London-wide SHLAA/HCS (2009) is currently being updated in addition to the London-wide Strategic Housing Market Assessment (2008).

More information, in relation to the above, is likely to be set out in the London-wide SHMA update and London Plan Further Alterations in 2014 and in the London Plan a revised target is expected in 2015/16.

The South-East London sub region commissioned a SHMA that was carried out in 2008/09. The study demonstrated a high level of need across the sub region and highlighted a number of key challenges and issues, including an estimated requirement for 10,450 additional market homes and a need for an extra 16,800 affordable homes over the next five years. The 2008/09 SHMA for the sub region will be updated in Spring 2014.

The Council agreed a five year supply paper in June 2013 that demonstrates the Borough can identify five years worth of deliverable housing. The Borough will seek to identify a supply of specific, developable sites or broad locations for the remainder of the Plan period in the next stage of Plan preparation, when sites are allocated.

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	2011/12 2012/13	–	Years (2013/14- 2017/18)	Years (2018/19 2020/21)
Cumulative Units identified/delivered	1213		4172	4725
Cumulative London Plan Requirement 2011-2021(units)	1000		3500	5000

Table xx Borough Housing Delivery for the London Plan period (2011/12 - 2020/2021) November 2013

INSERT WARD MAP SHOWING HOUSING PROVISION 2011/12 – 2024/25 (9+ UNITS)

Draft Policy - Backland and Garden Land Development

New residential development will be resisted on backland or garden land unless all of the following criteria are met:

There is no unacceptable impact upon the character and appearance of an area in relation to the scale, design and density of the proposed development;

There is no unacceptable loss of landscaping, habitats, or playspace;

There is no unacceptable impact on the residential amenity of future or existing occupiers through loss of privacy, sunlight and daylight and disturbance from additional traffic;

A high standard of separation and landscaping is provided.

Supporting Text

In the past the role of small sites in providing additional housing within the Borough is not insignificant. Of importance though is the value of backland and garden land in helping to define local character. There is a risk that inappropriate redevelopment of these small sites over time could adversely impact upon local character, especially as the availability of sites diminishes.

The definition of previously developed land in the NPPF excludes land in built up areas such as private residential gardens. The Framework also specifies that windfall sites are normally previously developed sites. Core planning principles include; seeking high quality design and a good standard of amenity for all existing and future occupants of land and buildings, taking account of the different roles and character of different areas and encouraging the effective use of land by reusing land that has been previously developed. It also advises Local Planning Authorities to consider the case for setting out policies to resist inappropriate development of

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residential gardens, for example, where development would cause harm to the local area.

The supporting paragraphs to London Plan Policy 3.5 recognise the important role that gardens play. They acknowledge that pressure for new housing development means that gardens can be threatened by inappropriate development and their loss can cause significant local concern. Paragraph 3.34 also specifies that back gardens are a cherished part of the London townscape contributing to communities' sense of place and quality of life. The London Plan supports the presumption against development on back gardens where it can be justified.

Many residential areas within the Borough are characterised by spacious rear gardens and well separated buildings. Proposals which undermine the character of the Borough or which would be likely to result in detriment to existing residential amenities will be resisted. The Council will also resist the loss of private residential gardens on the basis of; the contribution that they make to enhancing the character and appearance of the area (including the contribution made by trees and other vegetation on the site), their role as play space, their contribution to mitigating climate change and reducing flood risk, and their ecological value in terms of providing habitats for wildlife.

"Tandem" development, consisting of one house immediately behind another and sharing the same access, is generally unsatisfactory because of difficulties of access to the house at the back and the disturbance and lack of privacy suffered by the house in front. Backland or garden land development, involving development of land surrounded by existing properties, often using back gardens and creating a new access, will generally also be resisted, including sites in ASRCs.

Draft Policy - Housing Design

All new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places. Housing schemes will also need to respect local character, spatial standards, physical context and density. The Council will expect the following requirements to be demonstrated:

The site layout, buildings and space around buildings are designed to a high quality, recognising as well as complimenting the qualities of the surrounding areas;

Minimum space standards as set out in Table 3.3 of the London Plan and the London Plan Housing Supplementary Planning Guidance (as updated);

The provision of sufficient external, private amenity space that is accessible and practical;

For developments with an estimated occupancy of 10 or more children development proposals should make appropriate play provision;

Off street parking that is well integrated within the overall design of the development (further detail regarding standards to follow);

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Density that has regard to the London Plan density matrix whilst respecting local character;

Layout that is designed to give priority to pedestrians and cyclists over the movement and parking of vehicles;

Safety and security measures are included in the design and layout of buildings and public areas;

All new housing is built to the Lifetime Homes standards;

In residential developments of 10 or more units, 10% of units are designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Supporting Text

New housing development should make a positive contribution to the area in which it is located. Policies 3.5 and 7.4 of the London Plan emphasise the importance of new developments taking account of physical context, local character and a design approach that has an understanding of place.

Within the Borough there are many diverse and attractive housing areas. In the context of Government policy it is the Council's view that their individual characteristics and quality should be adequately protected. Scope for further housing development often occurs on "infill" sites, the redevelopment of older, low-density property and through the redevelopment of large non-residential sites. The Council's primary objective is to ensure a high standard of residential environment. Redevelopment should be of a design that is sympathetic to and complements the surrounding residential area but not necessarily a reproduction of the established form and pattern of development. In line with the advice in the NPPF (paras. 57) it is important to plan positively for the achievement of high quality and inclusive design for all development. The Council will reject poor designs that do not accord with this advice. The onus will be on applicants to demonstrate how they have taken account of the need for good layout and design.

The design of housing developments should be of a high quality internally, externally and should relate to their context and the wider environment. The Mayor's Housing SPG sets out baseline standards that are considered to be of particular strategic concern and set the baseline for quality and design those new homes should meet. The extent to which proposed developments depart from these should be taken into account in planning decisions. Good practice standards represent general good practice. The adoption of these can help lead to exemplary housing quality and design. Consideration should be given to the standards alongside the achievement of other objectives in the London Plan. The standards apply to new build, conversions and changes of use but not to specialist housing (student, sheltered and HMO accommodation). The Council encourages applicants to include information

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within design and access statements on how the above standards have been complied with.

Good urban design including space around and between buildings and their landscaping contributes to the quality of the built environment. In major development proposals a design statement should be submitted to the Council to include information of the key design principles, density, mix and distribution of uses as well as provide sufficient illustrations to demonstrate the relationship of the development to its wider surroundings.

The design of all new housing developments should include appropriate measures to maximise security and prevent crime. In determining planning applications the Council will refer to 'Secured By Design' principles, Government guidance on 'Safer Places' and any other supplementary planning guidance. "Secured by Design" is a UK Police Flagship initiative supporting the principles of designing out crime through the use of effective crime prevention and security standards set out in various guides and publications. Detailed information is available at www.securedbydesign.com.

The Council is required to incorporate minimum space standards (based on Gross Internal Floor Areas) in line with those set out in Table 3.3 of the London Plan and the Mayors Housing SPG. By meeting space standards it is possible for all new homes to be fit for purpose, with the potential to be occupied over time by households of all tenures. The standards are minima and should be exceeded where possible (subject to para. 2.3.17 of the Housing SPG that specifies exceptions to this).

Regard will be had to the London Plan Density Matrix whilst respecting local character. The Matrix is intended to be used as a guide and there may be convincing environmental or local character arguments for an alternative density. This may result in some developments coming forward at densities lower than that set out in the London Plan Density Matrix and some coming forward at higher densities.

Of importance is the provision of practical, accessible and useable private amenity space within new housing developments. Minimum standards are set out for London but it is important to address the existing character of amenity space within an area and show how new developments can relate to it. Private amenity space should be accessible and have level access from the home. Houses and ground floor flats should have access to private gardens and dwellings on upper floors should have access to private amenity space.

Policy 3.8 Housing Choice of the London Plan specifies that Boroughs ensure that all new housing is built to 'The Lifetime Homes' standards and that 10% of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The Mayor's Housing SPG sets out housing design standards that incorporate The Lifetime Homes criteria and Annex 2 of the SPG summarises best practice on wheelchair accessible housing. Standards reflect the importance of how new housing should meet the needs of Londoners at different stages of life. Guidance for wheelchair housing set out within "Wheelchair Housing Design Guide" (Thorpe and Habinteg Housing Association). Wheelchair Housing provided as

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Affordable Housing will be required to comply with the South East London Housing Partnership Wheelchair Homes Design Guidelines.

Of importance is the need to produce environments which support health and wellbeing, including through the provision of new housing. This is supported through the following documents:

Bromley Health & Wellbeing Board's Strategy 2012-2015
http://bromley.mylifeportal.co.uk/uploadedFiles/Putting_People_First/Bromley_Home_page/Document_Library/General/Final%20Bromley%20Health%20and%20Wellbeing%20Strategy%202012.pdf

Bromley JSNA 2012

http://bromley.mylifeportal.co.uk/uploadedFiles/Putting_People_First/Bromley_Home_page/Document_Library/Public_Health/BROMLEY%20JSNA%202012%20FINAL%20VERSION.pdf

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Draft Policy - Provision of affordable housing

In order to meet the needs of the Borough, affordable housing will be sought on all housing sites capable of providing 10 dwellings or more, or housing sites of 0.4ha or larger, irrespective of the number of dwellings.

On all sites at or above this threshold negotiations will take place to determine the number of affordable dwellings to be provided. In negotiating the amount of affordable housing on each site, the Council will seek 35% provision, with 60% social-rented/affordable rented housing and 40% intermediate provision, unless it can be demonstrated that a lower level should be sought or that the 60:40 split would not create mixed and balanced communities.

The affordability of different elements of the scheme should not immediately be apparent from the siting, design and layout.

The affordable housing should be made available for transfer or occupation before a certain proportion (to be determined through negotiations between the Council and developer) of the market housing is occupied.

Where a lesser amount is sought the Council will require evidence within a Financial Viability Appraisal that will be independently assessed.

Payments in lieu

Where it has been determined that a site meets the size threshold and is suitable for affordable housing, payment in-lieu of affordable housing on site or provision in another location will be acceptable only in exceptional circumstances and where it can be demonstrated that:

- it would be impractical to transfer the affordable housing to a registered provider (RP); or

-on site provision of affordable units would reduce the viability of the development to such a degree that it would not proceed; or

-on site provision of affordable units would not create mixed and balanced communities and there would be benefit in providing such units at another location.

Supporting text

The NPPF specifies that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. Where affordable housing is needed policies should be for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (i.e. to improve or make more effective use of the existing housing stock) and the agreed approach contributes to mixed and balanced communities.

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The London Plan defines affordable housing as including social-rented, affordable rented and intermediate housing. Local plans should take account of; current and future housing requirements, targets and the priority for affordable housing across London, promoting mixed and balanced communities, the capacity available to accommodate development and the viability of future developments. There is the need to encourage rather than restrain residential development, determine the size and type of units needed in particular locations and take into account the specific circumstances of sites.

In relation to individual sites the London Plan highlights that the following should be considered;

- the viability of the development,
- availability of public subsidy,
- implications of phased development and making provisions, if necessary, to reappraise viability prior to implementation,
- integration of affordable units within developments as a whole and
- application of Mayor's space standards to schemes where large units prevent the affordable housing policy being triggered.

The South-East London sub region commissioned a SHMA that was carried out in 2008/09. The study demonstrated a high level of need across the sub region and highlighted a number of key challenges and issues, including an estimated requirement for 10,450 additional market homes and a need for an extra 16,800 affordable homes over the next five years. The 2008/09 SHMA for the sub region will be updated in Spring 2014.

An Affordable Housing Viability Assessment Update (2012) showed that a single Borough-wide approach to affordable housing provision is suitable as long as there is flexibility to enable the amount of affordable housing on site to be negotiated. A percentage target of 35% on site affordable housing is viable. The target is not set as a maximum level and there may be some sites that come forward with more than 35% affordable housing, particularly on smaller sites.

The target relates to the percentage of habitable rooms on site although the Council will consider the overall contribution in terms of floor space and unit numbers to ensure that a proportionate percentage of overall development is affordable housing. The tenure mix of 60% affordable rented/social rented and 40% intermediate housing is in accordance with LP Policy 3.11 and the Mayor's Housing SPG.

The Council believes that some of its priority needs can only be met by social-rented/affordable rented housing. Shared ownership, low-cost market, and sub-market rented housing have a role principally in relation to intermediate housing. Such options may also assist some households unable to access market housing but which the Council has a duty to assist through its strategic enabling role.

Affordable housing comprises both social-rented/affordable rented housing and intermediate housing.

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Social-rented housing is defined as housing provided by a landlord where access is on the basis of housing need, and rents are no higher than target rents set by the Government for housing association and local authority rents.

Affordable rented housing is rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent.

Intermediate housing is sub-market housing available to people on moderate incomes who cannot afford to buy or rent housing generally available on the open market. Intermediate housing may take the form of shared ownership, low cost home ownership or sub market rented housing. These sources of intermediate housing can play an important role in providing mixed communities, ensure that those on moderate incomes in Bromley (including key workers) have access to decent homes and can be controlled to ensure that it is available in the long term. The London Plan defines affordability for intermediate housing as those households earning £18,100 - £61,400 (two+ bedroom units extends this to £74,000).

The affordable housing policy will usually be applied to the number of habitable rooms. The Council will advise applicants of the mix of units on individual sites that will be required to meet local needs.

In negotiating the level of affordable housing the Council will seek the provision of 35% of habitable rooms on a site unless material considerations indicate otherwise. In these negotiations the principal considerations will be:

Proximity to local services and facilities and access to public transport.

Whether there will be particular costs associated with the development of the site: this will usually be reflected in the residual land value and should not affect a site's suitability. The onus will be on applicants to submit a financial viability appraisal to demonstrate that abnormal development costs, in addition to the affordable housing contribution, would impact unduly on scheme viability.

Whether the provision of affordable housing would prejudice the realisation of other planning objectives.

The need to achieve a successful housing development, both in terms of unit size/tenure mix and management.

The Government aims to promote mixed and balanced communities so off-site provision or payments in lieu will rarely be acceptable. On sites capable of accommodating 10 units/0.4ha or more, off-site provision or a payment in lieu may be acceptable in exceptional circumstances if applicants are able to demonstrate (and the evidence submitted is verified by the Council or independent consultants) that on-site provision would be practically difficult. If off-site provision is offered, the onus will initially be on the developer to find and provide an alternative site. Where the other site falls below the 10-unit/0.4ha threshold, the 35% requirement will be applied to the total capacity of both sites.

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The means of controlling future occupancy of affordable housing will be the subject of negotiations between the relevant parties. The preferred approach for controlling the occupancy of social/affordable rented housing is for the ownership of this housing to be transferred to an RP nominated or agreed by the Council. In the case of intermediate housing, arrangements will depend on the type and tenure of housing proposed. In all cases, the arrangements for securing occupancy will be confirmed either through a legal agreement or condition attached to the planning permission, whichever is more appropriate in the circumstances.

If the above restrictions are lifted any subsidy should be recycled for alternative affordable housing provision.

Further advice on the detailed implementation of the policy may be provided in a Supplementary Planning Document.

All other relevant policies and the Mayor's Housing SPG will apply to affordable housing developments, including those relating to housing design and layout.

Draft Policy - Parking of Commercial Vehicles

Where planning permission is required for the parking of a commercial vehicle within the curtilage of a residential property, the Council will only grant permission where:

Such parking would be unobtrusive and compatible with the residential surroundings;
and

The noise and disturbance created by such parking will not harm the residential amenities of occupiers of adjacent properties.

Supporting Text

The provision of permanent or long-term parking for a commercial vehicle associated with a residential property will often require planning permission. Such parking can often result in loss of amenity for adjoining residents through disturbance by vehicle movements and the visual impact of parked vehicles. The applicant would be expected to show that there was a genuine need for the parking facility, for example that it serves commercial activities legitimately pursued on or based at the property. Any such permission would be likely to include conditions that ensure the impact of the parking was minimised.

Draft Policy - Residential Extensions

The design and layout of proposals for the alteration or enlargement of residential properties will be required to satisfy all of the following criteria:

- the scale, form and materials of construction should respect or complement those of the host dwelling and be compatible with development in the surrounding area;
- space or gaps between buildings should be respected or maintained where these contribute to the character of the area;

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- dormer windows should be of a size and design appropriate to the roofscape and sited away from prominent roof pitches, unless dormers are a feature of the area

Supporting text

The Council will expect the design of residential extensions to blend with the style and materials of the main building. Where possible, the extension should incorporate a pitched roof and include a sympathetic roof design and materials. In particular, flat-roofed side extensions of two or more storeys to dwellings of traditional roof design will normally be resisted unless the extension is well set back from the building line and is unobtrusive.

New Draft Policy - Accommodation for family members

An extension to provide space for additional family members will be expected to meet the following criteria:

- the extension cannot be severed from the main dwelling-house
- in keeping with the design and scale of the existing dwelling-house

Supporting text

Residential extensions can provide additional accommodation which enables a household to accommodate disabled persons, or extended family members such as adult children returning from university or elderly relatives.

Problems can arise where this type of development constitutes a self-contained unit which could potentially be severed from the main dwelling. This can sometimes result in the creation of substandard accommodation with inadequate privacy, access provision, parking and amenity space.

Draft Policy - Side Space

When considering applications for new residential development, including extensions, the Council will normally require the following:

- for a proposal of two or more storey in height, a minimum 1 metre space from the side boundary of the site should be retained for the full height and length of the building; or
- where higher standards or separation of separation already exist within residential areas, proposals will be expected to provide a more generous side space.

Supporting text

The Council considers that the retention of space around residential buildings is essential to ensure adequate separation and to safeguard the privacy and amenity of adjoining residents. It is important to prevent a cramped appearance and unrelated terracing form occurring. It is also necessary to protect the high spatial standards

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and levels of visual amenity which characterise many of the Borough's residential areas.

Draft Policy - Residential Conversions

A proposal for the conversion of a single dwelling into two or more self-contained residential units or into non self-contained accommodation will be permitted provided that:

- the amenities of occupiers of neighbouring dwellings will not be harmed by loss of privacy, daylight or sunlight or by noise and disturbance;
- the resulting accommodation will provide a high quality living environment for the intended occupiers;
- on street or off street parking resulting from the development will not cause unsafe or inconvenient highway conditions.
- The character and appearance of the area is not adversely affected;
- there will not be a detrimental impact on housing choice in the locality and where accommodation at ground floor level is proposed, preference is given for family housing units with direct access to a garden; and
- safe and secure access is provided to each dwelling

This policy seeks to ensure that the Borough's older properties are efficiently used, in order to maximise, within environmental constraints, the contribution conversions make to housing supply. Such accommodation increases the choice in the housing market for smaller households, and provides a cheaper alternative to purpose-built flats, especially for first-time buyers and for rent by private landlords.

Existing housing stock comprising of small and medium size family dwellings continues to play an important role in meeting housing need. Many houses are too large for single occupation; conversion will extend their life by encouraging improvement and repair. There is the added advantage of retaining the established residential character of an area which can often be lost through redevelopment.

The Council will normally expect conversion work to improve the quality of the existing housing and to respect the residential amenities of adjoining properties. Any accommodation resulting from a conversion must be of a high standard and comply with London Plan (July 2011) policies and guidance within the Mayors Housing Supplementary Planning Guidance (November 2012) and proposals should address areas such as minimum space standards, car parking and outdoor spaces.

Conversions can often have adverse external effects, including parking in front garden areas, and can result in increased on-street parking and traffic. On-street parking can be a particular problem in areas where local shopping facilities or commuter car parking already causes congestion. The Council will resist conversions where they may result in a traffic hazard and be detrimental to the amenities of the residential area by reason of noise, visual impact or other inconvenience.

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Non-self-contained units should be retained and improved where appropriate. Applications for non-self-contained accommodation will be supported provided they meet a housing need and provide a high standard living environment – as defined in this and other policies in the plan.

(Note: evidence on housing need should be available through an updated sub regional SHMA Spring 2014).

Draft Policy - Conversion of non-residential buildings to residential

The Council will permit the conversion of genuinely redundant non-residential buildings to residential use, subject to achieving a satisfactorily quality of accommodation and amenity.

Supporting text

The NPPF supports the London Plan in seeking to realise town centre housing potential. Modernisation/redevelopment above shops or the conversion of surplus commercial space in the right location can help bring about underused and vacant non-residential units into active residential use.

The design of housing developments should be of a high quality internally, externally and should relate to their context and the wider environment. The Mayor's Housing SPG sets out baseline standards that are considered to be of particular strategic concern and set the baseline for quality and design those new homes should meet. The extent to which proposed developments depart from these should be taken into account in planning decisions. Good practice standards represent general good practice. The adoption of these can help lead to exemplary housing quality and design. Consideration should be given to the standards alongside the achievement of other objectives in the London Plan. The standards apply to new build, conversions and changes of use but not to specialist housing (student, sheltered and HMO accommodation). The Council encourages applicants to include information within design and access statements on how the above standards have been complied with.

Specialist & Older Peoples Accommodation

Bromley has an ageing population, the largest in London with 48,800 people aged 65+ years in Bromley at 2011 equating to almost 36,000 households. Additionally Bromley has a particularly large pre-retirement cohort (60 – 65 years) leading to an expected to increase to 52,350 people over 65years by 2014 (source: GLA Round 2010 Population Projections SHLAA).

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The National Planning Policy Framework encourages planning authorities to “plan for a mix of housing based on current and future demographic trends” and to consider a range of housing, including for older people, in local housing market assessments.

The London Plan advises that Local Plan preparation should take account of the changing age structure of London’s population and, in particular, the varied needs of older Londoners (Policy 3.8). The Mayoral Housing SPG (Nov 2012) advises that Boroughs should plan positively for specialist provision for older people.

Draft Policy - Specialist & Older Peoples Accommodation

The Council supports the provision of specialist housing across all tenures, where they are conveniently located for a range of local shops, services and public transport, appropriate to the mobility of the residents, and they provide appropriate parking and suitably landscaped amenity space. Proposals involving the loss of sites currently providing specialist accommodation will be resisted unless:

- it can be demonstrated that there is no demand for the existing accommodation and no demand for sites from alternative providers, or
- there is equal or greater replacement provision of improved specialist accommodation in an alternative appropriate location,

Where opportunities arise to maximise the use of sites currently providing specialist accommodation, proposals for extensions or redevelopments to providing additional accommodation will be looked on favourably, subject to appropriate scheme design.

Supporting Text

Models of accommodation designed for older people are changing and will continue to evolve over the plan period as new alternative models are developed. Over the last decade there has been a reduced reliance on residential care homes and a shift towards enabling people to retain their independence, remaining living in the community with appropriate support or in Extra Care Housing (ECH). ECH developments comprises of self-contained units, of a variety of tenure, with communal facilities provided and care available round the clock, which can be flexible to accommodate fluctuating needs. The ECH model provides improved opportunities for the physically frail, reducing the demand for residential care. However, there remains a potential growth in demand for both nursing and residential care for “Elderly Mentally Ill” (EMI) people.

Nationally, over 75% of all older households own their home outright, whilst 13% of all older person households in the borough live in the social rented sector. Conversely around 70% of the specialist housing stock is social rented with 30% in private tenures (private rented or owner-occupation). There is therefore an issue of tenure choice for older person households. The Mayor published Supplementary Planning Guidance on “Housing” in November 2012. The guidance reflects the tenure imbalance across London, noting that whilst most specialist housing for older

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Londoners in the social rented sector most of the future requirement is likely to come from people who are currently owner occupiers.

Bromley also has a significant number of elderly people living in their own homes with over 13,000 people over 75 years living alone in 2012 predicted to rise by 38% (5,100 people) to over 18,000 by 2030. This has implications for the physical and mental health of residents for example through risk of falls or social isolation. National studies indicate that 68% of older homeowners live in a home that has at least two spare bedrooms and over a third of older people are interested in the idea of retirement housing either now or in the future, suggesting a latent demand for private elderly specialist accommodation. (“A Better fit? Creating housing choices for an ageing population” April 2012 Shelter and the Joseph Rowntree Foundation)

There is a significant body of evidence summarised in the Elderly Persons Accommodation Paper which illustrates the scale of the challenge presented by an ageing population will need to be addressed over the plan period and the implications of elderly residents in unsuitable accommodation for support services and the National Health Service.

The London Assembly Housing Committee report “Homes for Older Londoners” (28th November 2013) notes that even in Outer London, specialist housing cannot compete with general needs housing for available land. As a result, large numbers of owner-occupiers, without significant assets or incomes, have very few options to move to more appropriate accommodation. Whilst in Feb 2012 Bromley had the highest number of specialist elderly units in London, as indicated above it also has the greatest number of elderly residents.

The London Plan acknowledges that existing sites and premises providing an element of care are a finite resource and may be threatened by higher value uses, indicating that where shortfalls of specialist housing needs have been identified, the possibility of other providers of specialist or supported needs accommodation using these existing sites should be explored (para 3.83). Such exploration should be demonstrated by evidence of appropriate and robust marketing for specialist or supported needs accommodation, for a minimum of a year.

Affordable Housing

There is currently ambiguity in the Use Class classification for the range of specialist accommodation for the elderly. Whilst Care Homes fall within Class D2, Extra Care type housing developments are treated as residential dwellings (C3) and therefore subject to other residential policies, including affordable housing policies.

The initial evidence regarding need indicates a shortage of specialist elderly market accommodation. The application of affordable housing principles to specialist elderly accommodation which falls within Class C3 undermines the policy which seeks to encourage the provision of specialist, and supported accommodation, and creates a perverse financial incentive favouring the provision of care homes over Extra Care Housing. It is the Council’s intention to amend Bromley’s adopted Affordable Housing SPG removing the requirement for affordable contributions from the full range of elderly specialist accommodation.

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Gypsies & Travellers

Background

Gypsies and Travellers have traditionally stopped in Bromley whilst working in and travelling through the Borough and over the last half century much of the Gypsy and Traveller population has become settled in housing with St Mary Cray having one of the largest settled housed Gypsy populations in the UK. For those who retain a nomadic lifestyle the Council has two dedicated permanent sites at Star Lane, St Paul's Cray and Old Maidstone Road. There are also a number of Irish Travellers who have lived within the Borough for significant periods of time and become part of the local community.

There is also a community of Travelling Show-people in Layhams Road. Show people are a community of self-employed business people who travel the country, often with their families, holding fairs. They do not in general share the same culture or traditions as Gypsies and Travellers

Draft Policy – Traveller's Accommodation

The Council will monitor and seek to address the accommodation needs of Travellers, including pitches for Gypsies and Travellers, and plots for Travelling Show-people, in partnership with representative groups and the wider sub region.

The Council will seek to meet the identified need for provision by first considering the potential within allocated Traveller sites. Proposals for new development within allocated traveller sites will need to be sensitively located and landscaped to minimise adverse impacts on the visual amenity of the site.

Proposals for new traveller sites to address an identified need for provision will be acceptable provided that:

- the site lies outside any areas of constraint, complying with Green Belt and other open space policies, and
- the site is well- related to schools, medical facilities, shops and public transport, and
- there are no adverse effects on the residential amenity of neighbouring properties and the local environment, and
- there are no adverse impacts on the health and wellbeing of travellers related to local environmental quality (such as noise and air quality). Sites in areas at high risk of flooding, including functional floodplains, will generally be resisted given the particular vulnerability of caravans.

With regard to the need for transit pitches the Council will work with the sub-region to secure their provision in an appropriate location within the sub-region.

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Supporting Text

The Government's Planning Policy for Traveller Sites (PPTS), relates to "Gypsies and Travellers" and "Travelling Show-people" under the single umbrella of "Travellers". It requires Local planning authorities to produce a robust evidence base to establish accommodation needs inform the preparation of local plans and planning decisions and to annually update a supply of specific deliverable sites sufficient to provide five years a worth of sites and broad locations for the longer term. The Bromley Gypsies and Travellers and Travelling Showpeople evidence base is available online and will be updated in accordance with planning guidance and the statutory duty to assess the accommodation needs of travellers under the Housing Act.

On the basis of the Bromley evidence base the Council will consider the potential for traveller sites to accommodate any increased need for pitches and a criteria based approach will be applied to proposals for new sites.

The PPTS advises that local planning authorities should limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. As with other forms of housing access to major roads or public transport services, will affect residents' ability to seek or retain employment, to attend school, further education or training and to access health services and shopping facilities.

Whilst new sites and pitches will be resisted in areas at high risk of flooding (Flood Zone 3, which includes the functional flood plain) where there are existing sites located in areas at low or medium risk of flooding (zones 1 or 2) appropriate mitigation should be undertaken to mitigate the risks associated with possible flood events on any new caravans.

Sites in Bromley which have either current or historic use as traveller sites lie within the Metropolitan Green Belt. Past studies have pointed out the difficulty in practice of finding sites other than within the Green Belt. Whilst the PPTS makes the point that such sites are inappropriate it advises that local planning authorities can, through the plan making process, make exceptional limited alteration to the defined Green Belt boundary for "Traveller sites" inset within the Green Belt, to meet specific, identified need. Through earlier stages of the Local Plan process the Council has proposed and consulted on the designation as "Traveller sites" of sites with planning permission for travellers and a number of sites with a significant history of occupation by travellers but without the benefit of permanent permission, at

Saltbox Hill.

Layhams Road ("Millies View", "St Joseph's Place", "Mead Green" and "Keston Mobile Park")

Hockenden Lane ("Adjacent to Vinsons Cottages" and "Trunks Alley")

In response to the evolving local evidence base and reflecting the PPTS guidance the Council will identify the traveller sites through the site allocations process.

Other boroughs in the London South Sub region (Croydon, Kingston upon Thames, Merton and Sutton) and indeed across London, have a lower provision of pitches and plots than Bromley. The London Plan (2011) advises that requirements should be identified and addressed in line with national policy, in co-

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ordination with neighbouring boroughs and districts. The Council will work sub-regionally, co-operating with the London South Sub Region and neighbouring authorities outside London.

Renewal Areas

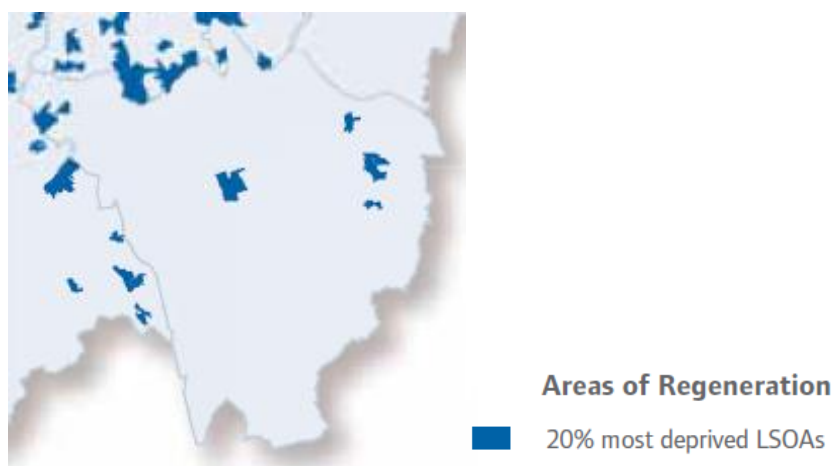
Introduction

The National Planning Policy Framework (2012) ministerial forward indicates that in order for planning to fulfil its purpose of helping achieve sustainable development “Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives”

The London Plan identifies its ‘Areas for Regeneration’, as the 20% most deprived Lower Super Output Areas (LSOAs) in London. London Plan Policy 2.14, advises that Boroughs should identify areas for regeneration and set out integrated spatial policies, bringing together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing, in locally based plans, strategies and policies.

Using information about income, employment, health deprivation and disability, education, skills and training, barriers to housing, and crime, The London Plan identifies 6 areas in Bromley, as Regeneration Areas. Generally Bromley, as a borough, scores favourably, however the pattern of scores, set out in detail in the 2011 Bromley Joint Strategic Needs Assessment (JSNA) is varied within the Borough, with concentrations of poorer scores to the north west of the Borough in Crystal Palace, Penge and Anerley, to the north in Mottingham, and to the east in the Cray Valley, as well as centrally through Downham and Bromley Common.

London Plan (2011) Map 2.5 Regeneration Areas



Source DCLG ONS Boundaries Lower Super Output Area Boundaries (2007)

The London Plan map is a snapshot highlighting tightly drawn electoral districts. However, they do not take account of the picture in the wider area, changes taking place over time, or other areas where the Council and partner

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organisations are already seeking to address issues of renewal, notably other parts of Crystal Palace, Penge & Anerley, the Cray Valley and Mottingham.

The Council recognises that addressing renewal based on the broader Bromley “Places” enables opportunities within those Places to respond positively to changes being experienced, harnessing the contribution to the economic, environmental and social well-being, as well as maximising the potential to address issues which led to the London Plan designation of some specific areas as Regeneration Areas.

The Bromley “Areas of Renewal” comprise:

‘Places’ which incorporate “Areas of Regeneration” identified by the Mayor illustrated in London Plan Map 2.5 (below),

Crystal Palace, Penge & Anerley

Bromley Common

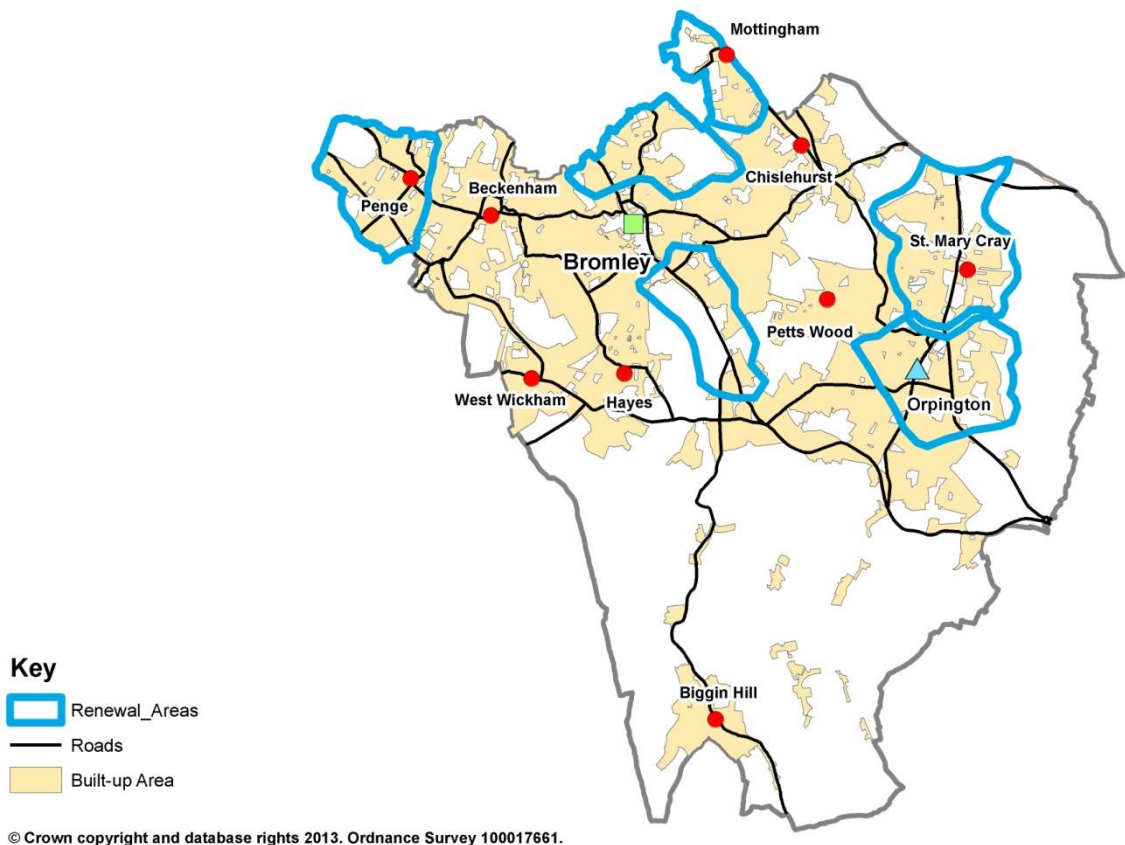
The Cray Valley, including Cray Valley, St Paul’s Cray, St Mary Cray and Orpington
Goddington & Knoll

‘Places’ which adjoin Mayoral “Areas of Regeneration” in neighbouring Boroughs

Mottingham

Ravensbourne, Plaistow and Sundridge

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Draft Policy - Renewal Areas

The Council will seek to maximise opportunities for enhancement and improvement within the Renewal Areas. Proposals should provide demonstrable economic, social and environmental benefits and address identified issues and opportunities. For example, proposals will be expected to maximise opportunities to:

- a) deliver high quality environments, which complement and enhance existing development and “assets”, including built heritage and environmental assets
- b) support health and wellbeing by producing healthy environments through scheme designs and expanding access to recreation, leisure and by, optimising opportunities to increase the provision or enhance the quality of open spaces and recreational facilities.
- c) create inclusive communities, engaging and involving the local community in the development of proposals and acknowledging and, where appropriate, responding to locally developed plans,
- d) encourage an appropriate mix of housing tenures, particularly within the Mayor’s defined “Areas of Regeneration”, that will promote mixed and balanced communities.

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e) make a positive contribution to the vitality of local centres having regard for their importance as providers both of local facilities and local employment

f) to acknowledge relevant initiatives and plans in adjacent boroughs and cooperate with them to plan strategically across administrative boundaries and to maximise the benefits of proposals with cross borough impacts,

g) improve accessibility, developing transport connectivity across transport modes.

h) weight will be attached to proposals which deliver improvements to address the particular issues relating to the Mayor's "Areas for Regeneration" within the Borough.

Supporting Text

The NPPF advises that plans need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

The Localism Act places a duty on local authorities to work together on planning issues. The NPPF expands on this, indicating that Local Plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. It will be important to take full account of plans, developed in partnership with the Council such as the Penge Renewal Strategy, and Mottingham Big Local Vision and Partnership Plan (March 2013). Additionally there may be local groups and plans which develop within the communities themselves.

Both the Crystal Palace, Penge & Anerley Renewal Area and The Cray Valley Renewal Area have cross border issues. The Crystal Palace District Centre falls under three London Boroughs, Bromley sharing a boundary with Croydon Council. The Cray Valley Renewal Area includes the Foots Cray Industrial Business Park which straddles Bromley and Bexley Council.

The Renewal Areas of Mottingham and of Ravensbourne, Plaistow and Sundridge, whilst not including "Areas for Regeneration" identified by the Mayor but include estates which cross borough boundaries with Greenwich and / or Lewisham and include adjacent "Areas for Regeneration" within those boroughs.

The various Renewal Areas have a range of assets both physical and community based. Thus they may offer potential for enhancement though a range of different opportunities. The Bromley Local Plan Characterisation Document will highlight a range issues, challenges, key sites and opportunities within the various Renewal Areas which development proposals should take into account.

Sites and Development Briefs

The Council will consider the potential of sites, in or close to Renewal Areas to contribute to economic, social and environmental improvements and will, where appropriate, prepare Development Briefs.

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Where appropriate the Council will consider preparing a “Development Brief” to provide guidance on resolving design and planning more broadly to communicate to developers the acceptable quality and quantity of development, including the spatial distribution of uses on a particular site. It should deliver a degree of certainty to prospective developers and help to coordinate development, guide local decision-making and, ultimately, speed up the overall planning application process.

Sites lying close to Renewal Areas may also offer the potential for developments of a scale which would enable them to contribute to economic, social and environmental improvements within the Renewal Areas. In such circumstances proposals will be expected to comply with Renewal Area policies.

Specific Renewal Area Policies

Developments within Renewal Areas which are experiencing significant transition and growth and additionally incorporate Mayoral “Areas for Regeneration” will be expected to respond to particular opportunities as they present themselves.

Draft Policy - Crystal Palace Penge & Anerley Renewal Area

Proposals within the Crystal Palace, Penge & Anerley Renewal Area proposals will be expected to maximise opportunities:

to contribute to, and benefit from the thriving cultural and leisure economy which has evolved in the Crystal Palace District Centre, and

presented by the enhancement of, and development within, Crystal Palace Park, for the benefit of the wider area, and

to support the Penge Renewal Strategy.

London Plan defines Crystal Palace as a District Centre and it is proposed that this designation be adopted through the Local Plan (as set out in Town Centre policy) The centre straddles three boroughs falling substantially within the London Borough of Croydon whose Local Plan Strategic Policies (adopted April 2013) identifies Crystal Palace as an Enterprise Centre where it seeks to promote the growth and expansion of Cultural and Creative Industries.

The Crystal Palace Park is a Grade II* listed park designated as Metropolitan Open Land which was once home to Sir Joseph Paxton's Crystal Palace, the structure which originally housed the Great Exhibition in 1851. There is an approved Master plan to restore the Park includes a museum, park maintenance facilities, children's nursery, cafes, information and retail kiosks, greenhouses, a treetop walk, a horticultural and animal husbandry training college and the development of 180 flats.

There are alternative proposals to transform Crystal Palace Park and the Council has entered into an exclusivity agreement for the development of proposals for a building which would match the spirit and form of the original Crystal Palace design

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which offers the potential to accommodate many different roles, including public exhibition space and commercial uses such as a hotel. The scale of investment is beyond anything proposed before and provides the opportunity to fund the Master Plan's ambitions to restore and upgrade the park but without the residential proposals contained in the Master Plan. These proposals are still at an early stage and public consultation is expected. If appropriate the proposals may be taken into account in the future preparation of the Local Plan.

The Crystal Palace, Penge & Anerley Renewal Area includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Betts Park and Maple Road / Franklin Road. Large scale proposals and notably proposals for the Crystal Palace Park have the potential to significantly benefit the wider area, supporting renewal and regeneration, including for example the development of enhanced transport connections such as the extension of the tram network and importantly boosting the local economy.

The implications of proposals within Crystal Palace Park are potentially beneficial to Penge District Centre, which, along with its surrounding areas has been the subject of a range of regeneration strategies and has recently experienced an uplift evident in a number of ways, including the change in fortunes of Maple Road market.

The Draft Renewal Strategy for Penge Town Centre (2011) seeks to provide a vision and establish a framework for improvements which will ensure that issues and development options are identified and assessed for maximum benefit; that new buildings and facilities are planned and designed in a co-ordinated manner so as to improve the existing townscape, environmental quality of the public realm and enhance the historical environment.

Penge Town Centre benefitted from Round 1 of the Outer London Fund (OLF) 2011/12 to support engagement with local businesses, residence associations and local community groups and other stakeholders businesses, a number of business support initiatives and environmental improvements as well as an events and entertainment programme. There is potential to unlock future OLF funding rounds for Penge.

Draft Policy - Bromley Common Renewal Area

Proposals within the Bromley Common Renewal Area will be expected to maximise opportunities to create a successful transition zone from Bromley Town Centre to the suburban and semi-rural urban fringe and produce a positive gateway to Bromley Town Centre along the Hayes Lane / Homesdale Road / A21(Bromley Common) junction supported by appropriate green infrastructure.

Supporting Text

Bromley Common Renewal Area forms part of the A21 corridor and as well as a being part of a major radial route into London this section of the A21 is an important transition area between Bromley Town Centre and the more rural and residential areas in the South of the Borough.

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The area has experienced recent change with the development of Trinity Village and further north the changing nature of Homedale Road from commercial offices buildings to flatted development. The Renewal Area also includes an identified by the Mayor as an Area for Regeneration in the vicinity of Turpington Lane.

The policy seeks to ensure that change is appropriately managed to ensure that the opportunities for the area to provide a successful transition to the town centre and a high quality residential environment and whilst protecting and enhancing valued environments and ensuring that recreational opportunities are maximised to cater for the growing population within the Renewal Area. Such opportunities might for example include aspirations for a BMX track and an enhanced cycling provision in Norman Park.

The nature of education provision is changing, allied to significant pressure for educational places. Bromley Common Renewal Area has significant educational infrastructure, including both primary and secondary schools and Bromley College of Further and Higher Education.

Draft Policy - Cray Valley Renewal Area

Proposals within the Cray Valley Renewal Area proposals will be expected to maximise opportunities:

to create a successful economic “growth area” along the Cray Valley, including the Cray Business Corridor, supporting the health and wellbeing of the community, and

to support Orpington Town Centre in its role, as a Major Town Centre, serving the east of the Borough in respect of retailing and community services and developing a thriving retail, office and leisure economy.

Supporting Text

The Cray Valley Renewal Area comprises two adjacent identified “Places” within Bromley, namely

“Cray Valley, St Paul’s Cray & St Mary Cray”

“Orpington Goddington and Knoll”

The main business areas within the Cray Business Corridor account for approximately half the business floor-space in the borough (excluding scattered employment sites and town centres) .The Cray Valley is the Borough’s most significant business area and is defined as a Strategic Industrial Location (SIL) in the London Plan as part of the Foots Cray Business Area. The area is one of those identified through the Local Plan as offering potential for growth.

Orpington is the boroughs second largest town and is important as a centre for retailing and community facilities. Whilst it is a competitive shopping destination it is under pressure from competing facilities such as the Nugent Shopping Park and because of the proximity of larger centres, such as Bromley and Bluewater. There are however a number of recent and proposed developments which will support the renewal of the town, notably the development of the Orpington Campus of Bromley College of further and higher education and the recent permission for

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enhancements to the Walnuts which includes a new multi-screen cinema as well as improved leisure and retail offer, reinforces Orpington's importance in respect of cultural and recreational facilities.

The Cray Valley Renewal Area includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Cotmandene Crescent, Blacksmiths Lane and Quilter Road. The health and wellbeing challenges in these areas and the surrounding areas are set out in the Joint Strategic Needs Assessment which highlights

SGS Spectrum were commissioned by the Cray Village Community Forum (CVCF) and supported by the London Borough of Bromley to produce "Shaping a better future - A feasibility report on improving services and facilities in the Crays" (2011)

In response to the Local Plan consultation several sites and proposals have been put forward within the Cray Valley to support sustainable regeneration. Such proposals will be considered at a later stage through the site allocations.

The London Greenways Scheme, 2009/10 project identified and funded safe walking and cycling routes along the Cray Valley from the boundary with the London Borough of Bexley, at Sandy Lane and Ruxley Corner, to its boundary with Kent County Council, at Hewitt's Roundabout, (beyond the Cray Valley Renewal Area) using, wherever possible, a network of "Greenways". The Greenway network, which is currently being completed, provides attractive and appealing routes for walking and cycling which are intended to encourage people to travel in ways that benefit their health and the environment.