

4. Living in Bromley

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Background

The National Planning Policy Framework (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.

Draft Policy x: Housing Supply

The Council will make provision for a minimum of **641** additional homes per annum over the fifteen year Plan period which will be achieved by:

- i. The development of allocated sites and sites with planning permission;
- ii. Town centre renewal involving the provision of housing;
- iii. The development of housing within Renewal Areas where appropriate;
- iv. The development or redevelopment of windfall sites;
- v. The conversion of suitable properties;
- vi. Mixed use developments including housing in suitable locations;
- vii. The provision of suitable non self-contained units;
- viii. Vacant properties being brought back into use;
- ix. 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.

The following sites are allocated to include residential development as outlined in Appendix x of the Plan:

Bromley Civic Centre (70 units)

Land adjacent to Bromley North Station (525 units)

The Hill Car Park and adjacent sites (150 units)

Gas holder site Homesdale Road (60 units)

Land adjacent to Bickley Station (30 units)
Bromley Valley Gym Chipperfield Road (200 units)
Orchard Lodge William Booth Road (200 units)
Bassetts House Broadwater Gardens (115 units)
Former Depot Bruce Grove Orpington (30 units)
West of Bromley High Street and land at Bromley South (1230 units)
Broad Locations (additional large sites within Bromley Town Centre, Orpington Town Centre and other areas where there is existing large scale retail).
Allocated sites will be subject to all relevant policies within the Local Plan and in addition subject to site specific requirements where necessary (footnote)
Maps in appendix 4 set out the site allocations and associated policy

Supporting Text

Section 6 of the NPPF sets out national policy on the delivery of homes. Paragraph 47 sets out what Local Planning Authorities should do to boost significantly the supply of housing. This includes housing needs assessments and identifying a supply of housing sites.

To assist in maintaining a five year supply of land for housing the Framework requires local planning authorities to look further into the future and to identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and where possible for years 11-15. London Plan Policy 3.3 provides a regional context for increasing housing supply and sets out London-wide and borough minimum targets for housing provision from 2015/16 – 2024/25. These are formed by the findings of the GLA's 2013 London Strategic Housing Land Availability Assessment (SHLAA) and the 2013 Strategic Housing Market Assessment (SHMA) and other analysis. Paragraph 3.14A of the London Plan states that, consistent with the NPPF the approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development.

Paragraph 3.17 of the London Plan states that on the supply side, the London SHLAA is designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework' (para 47 NPPF) not least its central dictum that resultant development must be sustainable. The SHLAA methodology is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. The methodology has been developed and refined over time through partnership working with boroughs and others involved in London

housing as well as to reflect the principles of government guidance on preparation of SHLAAs nationally.

The Borough has an annual housing provision figure of 641 units per annum as set out in Table 3.1 of the London Plan to assist in meeting requirements across London. The 2013 SHLAA specifies provision of approximately 289 units per annum on large sites (0.25 ha+) and 352 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 Supplementary Planning Guidance. Policy 3.3 of the London Plan specifies that 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).

The trajectory at Appendix 3 of the Draft Local Plan sets out the anticipated sources of housing supply over the Plan period. Specific sites that will help contribute to housing supply within the Borough over the next 15 years include; those in the Bromley Town Centre Area Action Plan (2010) and the Bromley Town Centre Opportunity Area, the five year supply of deliverable land for housing (June 2015 or as updated, update expected September 2016) and site allocations. Other housing units will also be provided on large and small windfall sites.

Paragraph 48 of the NPPF states 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. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. The PPG specifies in paragraph 3-24 the local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the NPPF).

The London-wide SHLAA 2013 made an assessment of the contribution that small sites (<0.25ha) have made to housing delivery within each London borough from 2004/05 – 2011/12. The figure was derived by taking an average of small site completions (new build, conversions and changes of use) 2004/05 – 2011/12 and removing 90% of new build completions built on garden land. The annual average figure for the Borough during this time period was 352 units. Over the ten year London Plan period (2015/16 – 24/25) the small site windfall figure could contribute 3520 units.

The London Plan (para 3.19A) observes that in compiling 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses and the London SHLAA's evidence, it must be recognised that in addressing this national objective, capacity which elsewhere in the country would be termed "windfall" must here form part of the 5 year supply.

Paragraph 1.1.28 of the GLA's Housing SPG (2016) states that the SHLAA provides the compelling evidence necessary to justify a windfall allowance for small sites based on historic trends, in line with paragraph 48 of the NPPF and reflecting distinct circumstances in London. It also states that trends show housing has been consistently delivered on small sites in the past and that this can be expected to provide a reliable source of future supply.

Paragraph 1.1.29 states that average annual trends (2004/05 – 2011/12) provide a consistent and appropriately long-term basis on which to estimate future supply, not least because they cover a full market cycle and take account of the impact of the recession. Trends also reflect particular local circumstances, for example, environmental/heritage designations and urban form. These specific points, together with the overall robustness of the SHLAA's capacity estimates for small sites, were tested through an EiP and were accepted in the Planning Inspector's Report on the 2015 London Plan. However, boroughs are encouraged to re-examine the potential capacity from small sites and explore policy approaches which may lead to the delivery of more homes on small sites where consistent with the Plan.

Delivery of housing on small sites is not insignificant in the Borough as demonstrated in the 2013 SHLAA. The inclusion of 4795 units over the Plan period takes into account advice set out in the NPPF, the PPG and the London Plan. Over one quarter of the small site allowance for Years 1-5 is identified as specific sites in the trajectory.

The housing trajectory illustrates the expected rate of housing delivery for a 15 year period. This will be monitored in a manner that is consistent with London Plan policy 3.3 and supplemented by a Bromley Annual Monitoring Report, so as to maintain a five year supply of housing land to meet the housing targets. This may include providing sites formed from later in the plan period. The Bromley Town Centre Area Action Plan (2010) review is due to commence in 2017 and the London Plan targets are due to be revised by 2019/20. These may offer opportunities for further sites to be identified in the future consistent with London Plan Policy 3.3E.

Summary of draft housing supply June 2016:

	Size of site	1-5*	6-10	11-15	Totals
Allocations and BTCAAP sites	Large	319	1455	880	2654
Large sites with planning permission / commenced	Large	1198	90	90	1378
Small sites with planning permission/commenced	Small	206	0	0	206
Large prior approval granted	Large	29	0	0	29
Small prior approval granted	Small	293	0	0	293
Small sites allowance (small sites commenced to be factored in prior to draft local plan consultation)	Small	1275	1760	1760	4795
Vacant units allowance		100	100	100	300
Prior approval allowance	Large/Small	150	0	0	150
Broad locations	Large	0	160	440	600
Overall total		3570	3565	3270	10405

Cumulative completions		3570	7135	10405	
Cumulative target plus 5%		3365	6730	10095	

*completions for 15/16 to be factored in prior to draft local plan consultation following verification during summer 2016 with GLA

A SHMA for the South-East London sub region was finalised in June 2014 and estimates an annual housing requirement across the sub region of 7200 units and a net annual need for 5000 affordable units. The net additional dwelling requirement for Bromley per annum was estimated at approximately 1320 units. Across the sub-region annual capacity targets identified within the 2013 SHLAA reach 7893 units. GLA household projections in 2014 estimate an annual short term variant of 1840 households per annum for the Borough and a long term variant of 1530 households per annum.

The 2014 SHMA highlights that the highest level of need across tenures within the Borough up to 2031 is for one bedroom units (53%) followed by 2 bedroom (21%) and 3 bedroom (20%) units. Larger development proposals (i.e. of 5+ units) should provide for a mix of units sizes and considered on a case by case basis.

Paragraph 3.19 of the London Plan states that boroughs should use their housing supply targets as a minima augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply. Examples of relevant locations that can help to achieve this include; town centres, opportunity and intensification areas and other large sites.

The allocations (including sites within Bromley Town Centre Area Action Plan) and broad locations referred to above are examples of such sites that will assist the Borough in meeting and exceeding its housing supply target over the Plan period. The key sites and broad locations identified above have the potential to deliver over 3200 units over the Plan period. The sites include; those identified following a call for sites in 2014, other known sites (for example Bromley Civic Centre and land adjacent to Bromley North Station) where an increase in density could be appropriate and sites identified in connection with the Bromley Town Centre housing zone (March 2016).

Work is currently being progressed in connection with the broad locations identified that will assist housing delivery over the Plan period.

The housing supply policy aims to minimise the net loss of housing through changes of use or redevelopment. Proposals for the change of use or redevelopment will only be permitted in the circumstances outlined in the policy.

Draft Policy x: Provision of Affordable Housing

In order to meet the needs of the Borough, affordable housing will be sought on all housing developments capable of providing 11 residential units or more or where the residential floorspace is more than 1000 sqm 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 an applicant proposes a level below the 35%, or the tenure mix is not policy compliant, 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 National Planning Policy Framework (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 towards mixed and balanced communities.

The National Planning Practice Guidance states that where local planning authorities are requiring affordable housing obligations they should be flexible in their requirements, planning obligations will take into account specific site circumstances. Paragraph 7 sets out that on individual schemes applicants should submit evidence on scheme viability where obligations are under consideration. Wherever possible applicants should provide viability evidence through an open book approach to improve the review of evidence submitted and for transparency.

There are specific circumstances where contributions for affordable housing should not be sought from small scale and self-build development. Paragraph 31 of the PPG states that these circumstances are:

- Contributions should not be sought from developments of 10 units or less and which have a maximum combined gross floorspace of no more than 1000 square metres;
- Affordable housing and tariff-style contributions should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home.

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 (Strategic Housing Market Assessment) SHMA that was carried out in 2014. The study demonstrates a high level of need across the sub-region and highlights a number of key challenges and issues, including a total housing requirement of 7188 units per annum across the sub region and an estimate of net annual affordable housing need of 5,000 units per annum in South East London. In Bromley there is a net annual need for affordable housing of about 1400 units per annum.

With regard to unit size targets for affordable dwellings the SHMA set out a baseline scenario and a scenario which addressed under-occupation and overcrowding. Sites that trigger the affordable housing policy should provide a mix of unit sizes in light of the information set out in the SHMA which shows a need for 1-3 bedroom units (with 1 and 2 bedroom units having a higher need). Currently, the highest level of need is for two bedroom units as reflected on the Council's Housing Register. Future updates in this respect will be set out in Committee reports or updates to the Council's Affordable Housing SPD. Individual sites will be considered on a case by case basis in consultation with the Council's Housing Division.

Following the affordable housing Viability Assessment Update (2012), a percent target of 35% affordable housing was set for sites which met the affordable housing threshold. 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.

Paragraphs 21-22 of the PPG set out the process for determining the vacant building credit where there is an overall increase in floorspace on site. It applies in instances where vacant buildings are being brought back into use or demolished as part of the scheme. It advises that a credit should be applied equivalent to the gross floorspace of the building on site and deducted from the overall affordable housing calculation. It applies where affordable units are being provided on site or where a financial contribution is being provided. The PPG cites an example; where a building with a gross floorspace of 8,000 square metres is demolished as part of development proposing 10,000 square metres any affordable contribution should be a fifth of what would normally be sought.

Reference is made to starter homes in the NPPG. We are currently awaiting further government guidance on the results of the technical consultation regarding the details of the application of the starter homes policy.

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:

- 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 where this does not exceed Local Housing Allowance levels unless by exception.
- 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 - £66,000 (two+ bedroom units extends this to £80,000).
- The latest Council intermediate housing income threshold (June 2015) review agreed upper limit thresholds as follows:
 - 1 bedroom units £38,800
 - 2 bedroom units £50,500
 - 3 bedroom units £62,500
 - GLA upper limit applies to 4 bedroom units+

These thresholds apply in accordance with Policy 3.10 Definition of Affordable Housing paragraph 3.62 of the London Plan.

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 providing 11 residential units or more or where the residential floorspace is more than 1000 sqm. 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 11 unit/1000sqm floorspace threshold, the 35% requirement will be applied to the total capacity of both sites.

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 a Registered Provider (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 x: General Design of Development

All development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout. Developments will be expected to meet all of the following criteria where they are relevant:

- i. be imaginative and attractive to look at, of a good architectural quality and should complement the scale, proportion, form, layout and materials of adjacent buildings and areas;
- ii. positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features;
- iii. Space about buildings should provide opportunities to create attractive settings with hard or soft landscaping (including enhancing biodiversity);
- iv. the relationship with existing buildings should allow for adequate daylight and sunlight to penetrate in and between buildings;
- v. respect the amenity of occupiers of neighbouring buildings and those of future occupants, providing healthy environments and ensuring they are not harmed by noise and disturbance, inadequate daylight, sunlight, privacy or by overshadowing;
- vi. the development should address sustainable design and construction and include where appropriate on-site energy generation;
- vii. suitable access should be provided for people with impaired mobility and meet the principles of inclusive design. Where necessary and relevant to the development, contributions may be sought to improve accessibility around the development;
- viii. Security and crime prevention measures should be included in the design and layout of building and public areas;
- ix. Recycling and waste storage facilities are incorporated within the design layout; and
- x. Respect non designated heritage assets. Applications should be accompanied by a written statement setting out design principles and illustrative material showing the relationship of the development to the wider context.

Supporting Text

The Council wishes to secure the creation of an attractive townscape and pleasant living and working conditions by ensuring that all new development (including extensions to existing buildings) makes a positive contribution to the area in which it is located and supporting the development of lifetime neighbourhoods. Good urban

design including the space around and between buildings and their landscaping contributes to the quality of the built environment and can help urban regeneration.

The London Plan advises boroughs to develop policies that ensure the physical environment can meet the highest standards of accessibility and inclusion and that the principles of inclusive design are adopted at the earliest stages in the development process (i.e. when preparing development briefs or masterplans). Reference will be made to the Mayor's SPG 'Accessible London: Achieving an Inclusive Environment (GLA, 2014).

The design of new development should safeguard public amenity and improve the quality of life in the borough with new development relating well to the character of its surroundings. New development affects the streetscape now and in the future. By careful control, its relationship to its surroundings will encourage appropriate and sensitive designs. The Council will prepare supplementary planning guidance on design. In doing so and when considering the design aspects of individual proposals, reference will also be made to advice in PPG, the NPPF and the London Plan (including Supplementary Planning Guidance).

There is a need to encourage local distinctiveness and "sense of place", particularly through the use of appropriate materials. Good modern design can be imaginative and innovative, and will be welcomed in appropriate circumstances where it contributes positively to the surrounding environment.

The Council will work in partnership with the police to promote designs and layouts which take account of crime prevention and community safety. Such measures should be taken into account when considering the design and layout of buildings and public areas. These measures can help create places that also connect well with other areas, encouraging the use of public transport, walking and cycling and ensure, for example, the overlooking of public areas, the inclusion of mixed uses that contribute to 24-hour occupancy, and the effective use of landscaping and lighting. In determining planning applications, the Council will refer to "Secured By Design" which is a UK Police Flagship initiative supporting the principles of designing out crime through the use of effective crime prevention and security standards, PPG and the NPPF.

In major development proposals a design statement should be submitted to the Council to include information on 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 Council will also consider making Article 4 Directions where appropriate.

With regard to sustainable design and construction and on-site energy generation proposals reference should also be made to Local Plan policies x/x and policies x/x of the London Plan.

Draft Policy x: Backland and Garden Land Development

New residential development will only be considered acceptable on backland or garden land if all of the following criteria are met:

- i. there is no unacceptable impact upon the character, appearance and context of an area in relation to the scale, design and density of the proposed development;
- ii. there is no unacceptable loss of landscaping, natural habitats, or play space or amenity space;
- iii. there is no unacceptable impact on the residential amenity of future or existing occupiers through loss of privacy, sunlight, daylight and disturbance from additional traffic; and
- iv. 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 has been significant. It is important to also consider the value of backland and garden land in helping to define local character. There is a risk that inappropriate development 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 National Planning Policy Framework (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 residential gardens, for example, where development would cause harm to the local area (paragraph 53).

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 locally justified by a sound local evidence base. The GLA Housing SPG specifies that boroughs are advised to consider proposals in light of local circumstances, taking into account the value gardens have in addressing a range of strategic policy objectives. It advises that there is a need to strike an appropriate balance between strategic policy objectives and other London Plan policies, in particular the objective to provide a wide choice of homes Londoners can afford.

Many residential areas within the Borough are characterised by spacious rear gardens and well separated buildings. Proposals which undermine the character or appearance (also including form and layout of existing areas) of the Borough or which would be likely to result in detriment to existing or future residential amenities will be resisted.

The following aspects will also be taken into account when assessing proposals; the contribution the site makes to enhancing the character and appearance of the area (including the contribution made by trees and other vegetation on the site), their role as amenity or 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 the difficulties of accessing the house at the back and the lack of privacy suffered by the house in front.

Draft Policy x: 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 all of the following requirements to be demonstrated:

- i. 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;
- ii. minimum space standards for dwellings as set out in Policy 3.5 and Table 3.3 of the London Plan and the London Plan Housing Supplementary Planning Guidance (as updated);
- iii. the provision of sufficient external, private amenity space that is accessible and practical;
- iv. the provision of appropriate play space in accordance with the Mayor's Play and Informal Recreation SPG;
- v. off-street parking that is well integrated within the overall design of the development;
- vi. density that has regard to the London Plan density matrix whilst respecting local character;
- vii. layout that is designed to give priority to pedestrians and cyclists over the movement and parking of vehicles;

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| vii. | safety and security measures are included in the design and layout of buildings and public areas; |
| viii. | ninety percent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings |
| ix. | ten percent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings' i.e. is 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. . The Council will ensure that new development meets the nationally described space standards (2015) which have been adopted by the London Plan (Policy 3.5 as updated).

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 National Planning Policy Framework (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 Supplementary Planning Guidance (SPG) sets out the minimum level of quality and design that new homes should meet. The extent to which proposed developments depart from these should be taken into account in planning decisions. 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, however the Council will still expect a satisfactory standard of accommodation to be provided in applications relating to specialist housing (student, sheltered and HMO accommodation (see also policy xx conversions & xx sheltered accommodation) The Council encourages applicants to include information 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 Mayor's Housing SPG (as updated). 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 minimal and should be exceeded where possible (subject to para. 2.3.25 of the Mayor's Housing SPG that specifies exceptions to this).

Regard will be given 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. The London Plan encourages high density development in appropriate locations such as larger town centres and places that benefit or will benefit from major new public transport improvements. In addition, the London Plan Housing SPG at Para 1.3.1 states that proper account must be taken of the range of factors which have to be addressed to "optimise" rather than simply maximise housing potential. It states that of particular importance are ensuring good design and taking into account public transport capacity, local context and character.

The provision of practical, accessible and usable private amenity space within new housing developments is important. 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 should ensure that ninety percent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and ten percent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings' i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. Standards reflect the importance of how new housing should meet the needs of Londoners at different stages of life. The Mayor's Housing SPG contains further information regarding these standards. Detailed guidance on how to meet these requirements is set out in "The Building Regulations. Access to and use of Buildings.

Approved Document M. Volume 1: Dwellings 2015 Edition Guidance for wheelchair housing is also set out in the “Wheelchair Housing Design Guide” (Thorpe and Habinteg Housing Association). Wheelchair Housing provided as 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 link between health and the environments we inhabit is recognised in the [Bromley Health and Wellbeing Board's Strategy 2012 - 2015](#) and the [Bromley Joint Strategic Needs Assessment \(JSNA\) 2012](#).

Draft Policy x: 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:

- i. such parking would be unobtrusive and compatible with the residential surroundings; and
- ii. 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 x: 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:

- i. 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;
- ii. space or gaps between buildings should be respected or maintained where these contribute to the character of the area; and

- iii. 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.

Draft Policy x: Accommodation for Family Members

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

- i. the extension cannot be severed from the main dwelling-house, and
- ii. is 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 x - Side Space

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

- i. for a proposal of two or more storeys 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
- ii. where higher standards 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 from occurring. It is also necessary to protect the high spatial standards and levels of visual amenity which characterise many of the Borough's residential areas.

Draft Policy x: Residential Conversions

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

- i. the amenities of occupiers of neighbouring dwellings will not be harmed by loss of privacy, daylight or sunlight or by noise and disturbance and;
- ii. the resulting accommodation will provide a high quality living environment for the intended occupiers and;
- iii. on and off street parking resulting from the development will not cause unsafe or inconvenient highway conditions and;
- iv. the character and appearance of the area is not adversely affected and;
- v. 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
- vi. safe and secure access is provided to each dwelling.

Supporting Text

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 and supply in the housing market for smaller households and provides an 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. Where houses are too large for single occupation; conversion may 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 The London Plan (2015) as updated and GLA's Housing Supplementary Planning Guidance (March 2016) 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.

Non-self-contained units should be retained and improved where appropriate. Applications for non-self-contained accommodation will be supported if they provide a high standard living environment as defined in this and other policies in the plan. Proposals for non-self-contained should also ensure that the relevant Environmental Health standards are met.

Draft Policy x: Conversion of Non-Residential Buildings to Residential

The Council will permit the conversion of [genuinely redundant] non-residential buildings to residential use, subject to [compliance with policies x/x] achieving good quality living accommodation, residential amenity and compliance with relevant building regulations. Proposals should ensure that on street and/or off street parking resulting from the development will not cause unsafe or inconvenient highways conditions.

Supporting Text

The National Planning Policy Framework (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 underused and vacant non-residential units into active residential use.

Where planning permission is required for such a conversion the applicant must be able to demonstrate that the premises are genuinely redundant. Proposals are not likely to be acceptable where there continues to be a demand for such uses – for example, where the loss of such premises would result in the loss of employment or prevent the creation of new business or employment opportunities. Therefore, this policy is subject to policies x/x that set out the requirements for the loss of other uses.

The design of housing developments should be of a high quality internally, externally and should relate to their context and the wider environment.

The London Plan (2015), Minor Alterations to the London Plan (March 2016) and the GLA's Housing Supplementary Planning Guidance (March 2016) set out relevant policies and standards in relation to the quality and design of housing developments. The Council encourages applicants to include information within design and access statements on how housing standards within the London Plan (and guidance) and Local Plan have been complied with.

Proposals should not result in an unacceptable increase in the demand for on street car parking or result in unsafe or inconvenient highways conditions. Sufficient information should be submitted to the Council to demonstrate this. Reference should also be made to Local Plan policies x/x Parking.

Specialist & Older Peoples Accommodation

Bromley has an ageing population; the largest in London with 52,000 people (approximately 17%) aged 65+ years in Bromley at 2011 and a particularly large pre-retirement cohort (60 – 65 years).

The National Planning Policy Framework (NPPF) 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 (March 2016) advises that certain types of specialist housing may need to be encouraged by planning policies, specifically, sheltered accommodation, extra care accommodation, and residential and nursing care.

Draft Policy x: 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:

- i. it can be demonstrated that there is no demand for the existing accommodation and no demand for sites from alternative providers, or
- ii. 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 continue to evolve. 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) which 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 only 13% of “all older person” households live in social rented homes. 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's Housing Supplementary Planning Guidance reflects the tenure imbalance across London, and encourages the provision of a range of housing options which reflect the diversity of tenure amongst older households.

Bromley has a significant number of elderly people living alone in their own homes. In 2012 over 13,000 people over 75 years lived alone and this is predicted to rise by 38% (5,100 people) to over 18,000 by 2030. Living alone has implications for the physical and mental health of residents for example through risk of falls or social isolation. Good quality safe warm and affordable housing can help maintain the physical and mental health of older people, help them stay independent for longer and assist in preventing delayed discharges from hospital.

National studies indicate that 68% of older homeowners live in a home that has at least two spare bedrooms and that 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. (April 2012 Shelter and the Joseph Rowntree Foundation)

The Elderly Persons Accommodation Paper (2014) 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.

Whilst Bromley has the highest number of specialist elderly units in London it also has the largest number of elderly residents and a significant pre retirement age group.

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 six months.

There is currently ambiguity in the Use Class classification for the range of specialist accommodation for the elderly. Whilst Care Homes fall within Class C2, Extra Care type housing developments are treated as residential dwellings (C3) and therefore subject to other residential policies, including affordable housing policies.

The Mayors Housing SPG 2016 highlights the "front door" test as the most robust way of distinguishing between C2 and C3 uses. Whilst the SPG notes that, where justified by identified need, some Extra Care schemes, functionally are effectively C2 units it advises local authorities to consider needs and viability concerns, and highlights the risk of proposals incorrectly categorised (perhaps to avoid s 106 contributions).

The London Plan indicates an “annualised strategic benchmark” for Bromley of 140 private sale units per annum and 65 intermediate sale units. There is a zero benchmark for affordable rented units.

Irrespective of use class Bromley’s Affordable Housing SPG indicates that proposals for sheltered housing and extra care homes are subject to the affordable housing policies (para 6.27). This will ensure that intermediate models, which developers are still devising, come forward to meet the need, subject to viability. Given the zero benchmark for affordable rented units this provision will be sought as “intermediate” provision.

The Mayors Housing SPG 2016 acknowledges the extra development costs associated with new specialist older persons housing and suggests these may require “bespoke” viability assessments for which independent validation will be sought at the developers cost.

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 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, in the south west of the Borough. Show-people are a community of self-employed business people who travel the country, often with their families, holding fairs. In general, they do not share the same culture or traditions as Gypsies and Travellers.

Draft Policy x: Traveller's Accommodation

The Council will ensure the continued provision of sites for Travellers (including Gypsies and Travellers and Travelling Showpeople) at the sites allocated as traveller sites only.

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 and adjoining land.

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

- i. the site lies outside any areas of constraint, complying with Green Belt and other open space policies, and
- ii. the site is well- related to schools, medical facilities, shops and public transport, and
- iii. there are no adverse effects on the residential amenity of neighbouring properties and the local environment, and
- iv. 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.

Traveller Sites will be safeguarded for the purposes of Traveller Sites only. Proposals that would result in the loss of all or part of a Traveller site will be refused unless the local planning authority is satisfied that there is no longer a need for the provision.

Given the allocation of the sites as insets within the Green Belt for Traveller sites only, only uses appropriate in the Green Belt will be permitted should the site no longer be needed for traveller purposes.

Supporting Text

The Government's Planning Policy for Traveller Sites (PPTS) 2015, defines '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 traveller accommodation needs, in order to inform the preparation of local plans and planning decisions, and to annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites, and broad locations for growth for years 6-10, and where possible years 11-15.

The Bromley Gypsies and Travellers and Travelling Show-people evidence base is available online and updated in accordance with planning guidance and the statutory duty to assess the accommodation needs of Travellers under section 8 of the Housing Act 1985.

The PPTS highlights the Government aim to promote more private traveller site provision and advises that, whilst reiterating that the Green Belt should be protected from inappropriate development, the PPTS does allow, in exceptional circumstances, for the limited alteration to the defined Green Belt boundary to accommodate a site inset within the Green Belt to meet a specific, identified need as "a traveller site only". The PPTS advises that this can only be undertaken through the plan-making process.

The Borough is covered to a large extent by planning and landscape constraints, notably open space designations, including Green Belt and Metropolitan Open Land, along with a range of other protective designations. These designations and other strategic needs of the plan, including the housing requirement, represent very significant challenges to identifying suitable locations for Traveller Sites.

All existing sites occupied by travellers lie within the Green Belt and are therefore by definition "inappropriate".

The "Travellers Site Assessment Background Paper" sets out the methodology used to assess sites. The methodology involves a three-tier site selection using key criteria reflecting the Planning Policy for Traveller Sites (PPTS) which

requires local authorities to ensure that traveller sites are sustainable economically, socially and environmentally.

The Local Plan addresses the accommodation needs of travellers, in line with the 'Planning Policy for Traveller Sites' (PPTS), through the allocation of sites with current or historic permissions as Traveller sites. The need set out in the "Gypsies and Travellers and Travelling Showpeople Accommodation Evidence Base" (2014 and subsequent updates) and the site assessment process, which confirms the lack of appropriate sites, together demonstrate the justification for "exceptional circumstances" to make limited alterations to produce "insets within the Green Belt" for removal and use "as a traveller site only" at the following currently occupied sites which benefit from current or historic permissions:

2 Gypsy and Traveller Council Sites

- Star Lane: 22 pitches
- Old Maidstone Road : 14 pitches

9 Gypsy and Traveller Private Sites

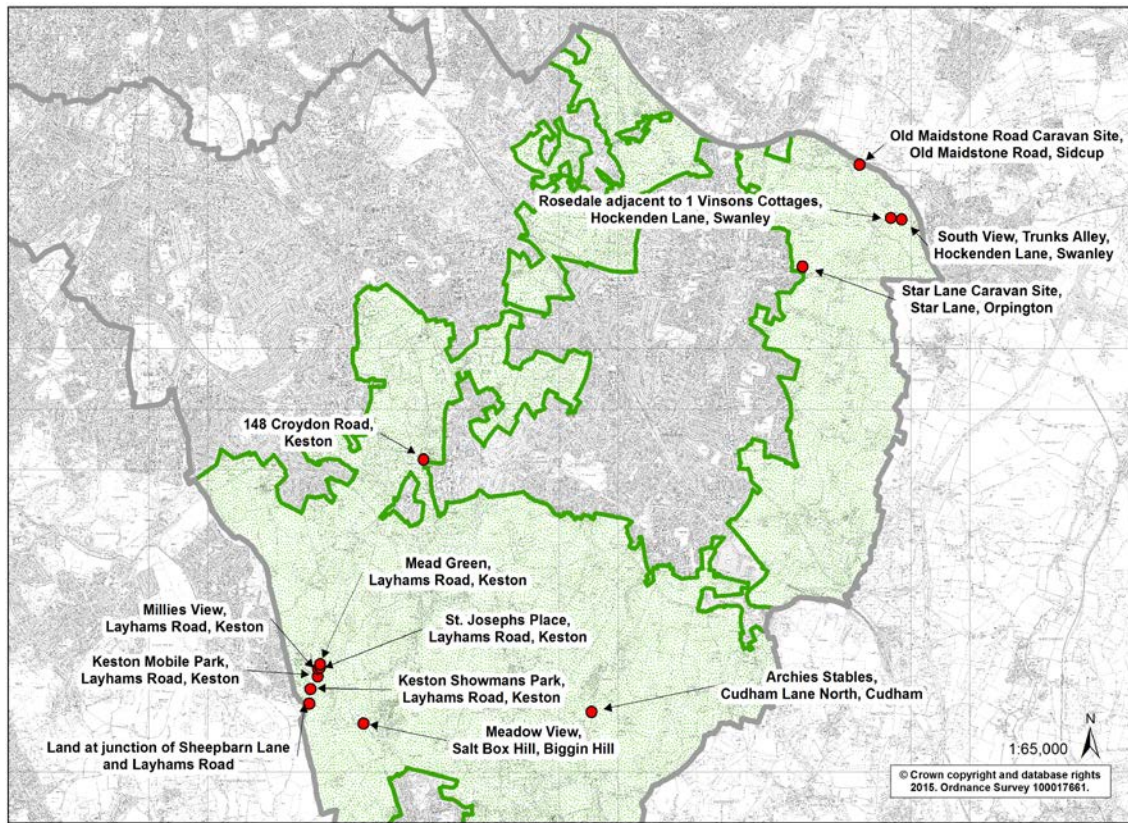
- 148 Croydon Road : 5 pitches
- Meadow View, Saltbox Hill : 3 pitches
- Archies Stables, Cudham Lane North: 1 pitch
- Hockenden Lane (2 sites)
 - Rosedale: single pitch
 - Southview, Trunks Alley: 2 pitches
- Layhams Road (4 sites, of which 3 are adjacent to each other)
 - Mead Green, Layhams Road : 2 pitches
 - St Joseph's Place, Layhams Road : 2 pitches
 - Millie's View, Layhams Road: 2 pitches
 - Keston Mobile Park, Layhams Road: 4 pitches

2 Travelling Showpeople Private Sites

- Keston Travelling Showmen's Ground, Layhams Road: 29 plots
- Land at the junction with Sheepbarn Lane, Layhams Road: 2 plots

(See individual map extracts in Appendix x)

Traveller Sites inset within the Green Belt



Future Need

In addition to establishing the appropriate level of pitch provision the guidance also requires Local Plans to enable effective enforcement of planning policy. Addressing needs in accordance with the guidance will assist the Council in resisting future inappropriate development in the Green Belt.

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

On the basis of the evidence base and site assessments, future need can be addressed from within the allocated Traveller sites, subject to planning permission. Any proposals for new sites will, having first considered the capacity within allocated Traveller sites, be assessed against the criteria within the policy, regarding open space, the availability of services and facilities, the impact on neighbouring properties and the local environment (including natural, built and historic features) and the health and wellbeing of the travellers.

Whilst 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. New sites and pitches will be resisted in areas at high risk of flooding (Flood Zone 3, which includes the functional flood plain)

The London Plan (2015) advises that requirements should be identified and addressed in line with national policy, in co-ordination with neighbouring boroughs and districts. In response to the London Plan and the 'Duty to Cooperate' (Section 110 of the Localism Act 2011) the Council will continue to engage with neighbouring authorities, within and beyond London, particularly in respect of the need for transit pitches, noting that other boroughs in the London South Sub region, and indeed across London, have a lower provision of pitches and plots than Bromley.

Renewal Areas

Introduction

Bromley has identified five ‘renewal areas’ which include the areas most ‘deprived’ as evidenced by the 2015 English Indices of Deprivation, based on information about income, employment, health deprivation and disability, education, skills and training, barriers to housing, and crime. <http://dclgapps.communities.gov.uk/imd/idmap.html>

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, indicates that the Mayor will prioritise these areas for renewal and 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. London Plan paragraph 2.63A states ‘the overriding objective of the Mayor’s regeneration programmes is to drive and shape growth in London’s town and economic centres and high streets.’

Generally Bromley, as a Borough, scores favourably, however the pattern of scores, varies 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 in Bromley Common, and in the Downham area of Ravensbourne, Plaistow and Sundridge

The 2015 English Indices of Deprivation shows all Bromley’s ‘renewal areas’ including pockets of deprivation in the 20% of census super output areas scoring highest nationally. These areas experience poorer health outcomes as illustrated in the 2012 Bromley Joint Strategic Needs Assessment which describes the indicators of the wider determinants of health and health outcomes for several of the renewal areas. A focus on these renewal areas can contribute to a reduction in health inequalities, improve links to employment opportunities and improve the overall ‘well-being’ of the area.

Bromley’s Renewal Areas

Bromley’s renewal areas draw on the Mayor’s Regeneration Areas, using the updated 2015 indices and reflect the broader Bromley ‘Places’. This enables opportunities within those ‘Places’ to respond positively to changes, 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 specific areas as Regeneration Areas.

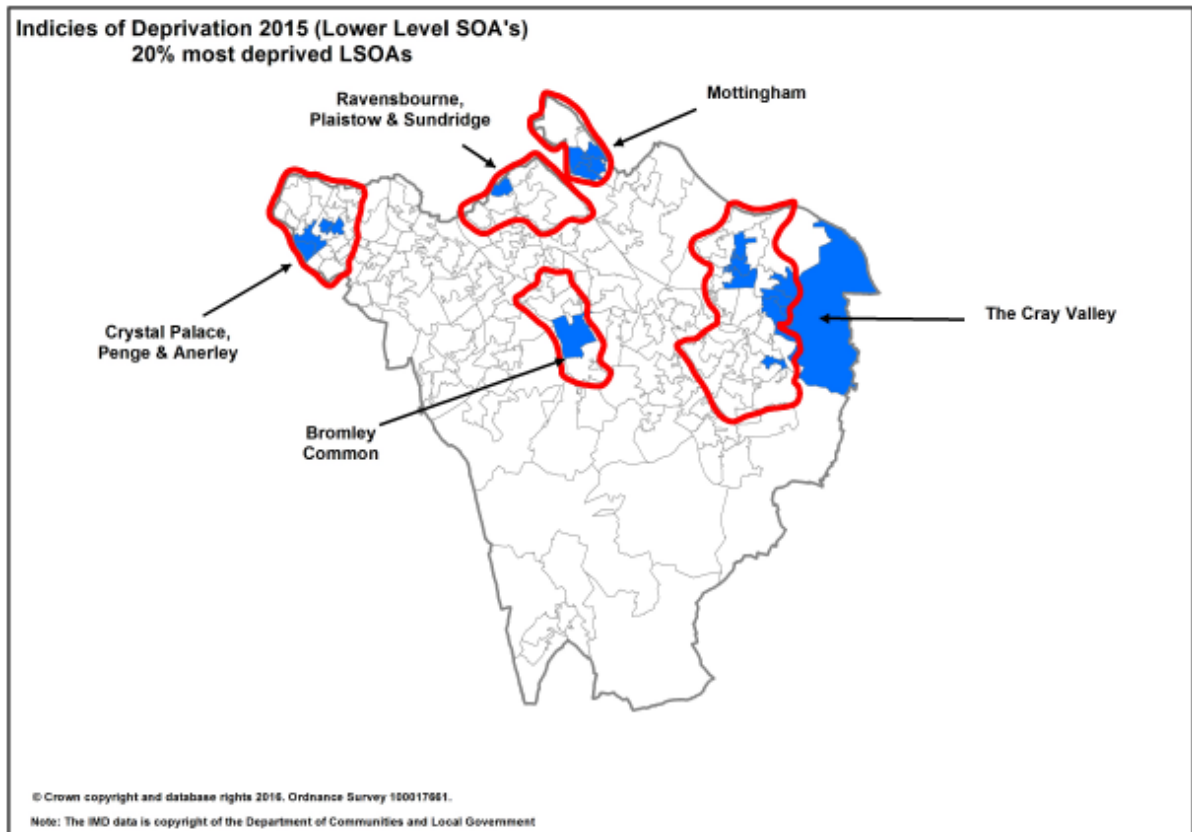
The Bromley “Areas of Renewal” comprise ‘Places’ which incorporate “Areas of Regeneration” identified by the Mayor in the 2011 London Plan Map 2.5 and in the updated 2015 London Plan Map 2.5 , Regeneration Areas, namely

- Crystal Palace, Penge & Anerley
- Bromley Common
- The Cray Valley, including two adjacent ‘Places’,

- Cray Valley, St Paul's Cray, St Mary Cray and
- Orpington, Goddington & Knoll
- Mottingham
- Ravensbourne, Plaistow and Sundridge

Bromley Renewal Areas Map

Illustrating Places incorporating the 20% most deprived LSOAs (Lower Super Output Area; Indices of Deprivation 2015).



Draft Policy x: 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:

- i. deliver high quality environments, which complement and enhance existing development and 'assets', including built heritage and other environmental assets;
- ii. 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;

- iii. create inclusive communities, engaging and involving the local community in the development of proposals and acknowledging and, where appropriate, responding to locally developed plans;
- iv. encourage an appropriate mix of housing tenures, particularly within the Mayor's defined "Areas of Regeneration", that will promote mixed and balanced communities;
- v. make a positive contribution to the vitality of local centres having regard for their importance as providers both of local facilities and local employment;
- vi. 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, and
- vii. improve accessibility, developing transport connectivity across transport modes.

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 National Planning Policy Framework (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 2011 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 by communities in partnership with the Council and other agencies, including Town Centre Initiatives, and local regeneration projects. (e.g. the Mottingham Big Local Vision and Partnership Plan March 2013).

Cross Borough Working

Two renewal areas have cross border planning designations. The Crystal Palace Renewal Area shares a District Centre boundary with Croydon Council, as well as boundaries with Lambeth, Southwark and Lewisham. The Cray Valley Renewal Area includes the Foots Cray Industrial Business Park which straddles the boundary between Bromley and Bexley boroughs.

The Mottingham Renewal Area includes the Mottingham estate which shares similar characteristics with the adjoining residential estates in Greenwich and Lewisham and the Downham area of the Ravensbourne, Plaistow and Sundridge Renewal Area forms part of the wider 'Downham' area which extends into the adjoining part of Lewisham. These adjacent residential areas in the neighbouring boroughs are also highlighted in the London Plan as 'Areas for Regeneration'.

The various Renewal Areas have a range of assets, physical, social and economic, which offer potential for enhancement through a range of different opportunities. The Bromley Local Plan seeks to address the characteristics of the 'Places' within the Borough, including the Renewal Areas and other guidance can be developed to expand on the range of issues, challenges, key sites and opportunities within the various Renewal Areas.

Draft Policy x: Development affecting Renewal Areas

The Council will require development, in or close to Renewal Areas to demonstrate that they have maximised their contribution to economic, social and environmental improvements and will, where appropriate, prepare Development Briefs or other guidance.

Supporting Text

Where appropriate the Council will consider preparing "Development Briefs" to provide more detailed guidance on design and planning issues and 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 and type 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 and to demonstrate that they have optimised their contribution to the economic, social and environmental well-being of the relevant Renewal Area

The health and wellbeing challenges in the renewal areas are set out in the Joint Strategic Needs Assessment 2012.

Specific Renewal Area Policies

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

Draft Policy x: Crystal Palace, Penge & Anerley Renewal Area

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

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

- ii. presented by the enhancement of, and development within, Crystal Palace Park, consistent with its heritage values and significance, and for the benefit of the wider area, and
- iii. to support renewal in Penge Town Centre.

Supporting Text

The 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 policy in the Working in Bromley chapter). The centre straddles three boroughs falling substantially within the London Borough of Croydon whose Local Plan Strategic Policies (adopted April 2013) identify 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. The Park adjoins four other London Boroughs and there is an approved Master Plan to restore the Park which 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, as well as the development of 180 flats.

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. The identification of Crystal Palace as a Strategic Outer London Development Centre (SOLDC) with a greater than sub-regional importance in relation to leisure and sport, together with the Crystal Palace Masterplan, which supports renewal and regeneration, has the potential to significantly benefit the wider area. In combination with the development of enhanced transport infrastructure, such as the extension of the tram network, these strategies present opportunities to boost the local economy.

The implications of proposals within Crystal Palace Park are potentially beneficial to Penge District Centre, which, along with the surrounding area has been the subject of regeneration programmes and recent improvements have contributed to the revival of Maple Road market.

Draft Policy x: 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.

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 area identified by the Mayor as an Area for Regeneration close to Turpington Lane.

The policy seeks to ensure that change is appropriately managed to ensure the opportunities for the area provide a successful transition to the town centre and a high quality residential environment whilst protecting and enhancing valued environments and ensuring that recreational opportunities are maximised to cater for the growing population within the Renewal Area.

The nature of education provision is changing, allied to significant pressure for educational places. The central location of Bromley Common Renewal Area within the Borough and the good public transport accessibility in the vicinity of the A21 has resulted in the location of significant educational infrastructure, including Bromley College of Further and Higher as well as both primary and secondary schools and the renewal area includes an allocation for an additional secondary school at Turpington Lane.

Draft Policy x: Cray Valley Renewal Area

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

- i. 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
- ii. to protect and enhance the green wildlife corridor along the River Cray, integrating with the public realm, along highways and open spaces and through commercial and industrial areas by creative design, and
- iii. 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 Cray Valley Renewal Area includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Cotmandene Crescent, Ramsden and east of St

Mary Cray High Street. It should be noted that the significant area along the eastern boundary of the Borough with Sevenoaks is a mapping anomaly. This large LSOA incorporates a significant area of very sparsely populated Green Belt, with the population concentrated within the residential area of the Cray Valley. The renewal areas are based on distinct places within the Borough rather than electoral districts and hence the renewal area excludes the place “Eastern Green Belt”.

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 strategic growth (see the Economic Growth policy in the Working in Bromley chapter).

Cray Village Community Forum (CVCF), supported by the Council produced “Shaping a better future - A feasibility report on improving services and facilities in the Crays” (2011)

Orpington is the Borough's 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 the proximity of larger centres, such as Bromley and Bluewater. Substantial investment in the town centre has seen the development of the Orpington campus of Bromley College of Further and Higher Education, an enhanced leisure and retail offer at the Walnuts Centre, including a new multi-screen cinema and a mixed use development incorporating a new health centre. These developments are reinforcing Orpington’s importance in respect of cultural, social and recreational facilities and its role as Major Town Centre.

Draft Policy x: Mottingham Renewal Area

Proposals within the Mottingham Renewal Area will be expected to maximise opportunities to support

- i. the vitality and viability of the Mottingham Local Centre and Kimmeridge Cross Neighbourhood Centre.
- ii. the enhancement of linkages with other areas of Bromley and adjoining boroughs, particularly in relation to centres of employment.
- iii. the protection and enhancement of the public realm and residential environment, particularly within the Mottingham Estate.

Supporting Text

The 1930s London County Council (LCC) Mottingham Estate, and indeed the adjoining LCC estates in Lewisham and Greenwich were part of the London wide housing programme between the two world wars, providing family housing with

private gardens, but no off street parking. These estates, which still retain some of the existing social infrastructure, feature in the Mayors 'Areas of Regeneration' as within the most deprived areas. It is notable that these residential estates, score well in terms of the "living environment" indices making the maintenance and enhancement of the living environment particularly important in these areas.

There have been a number of plans and strategies developed by the local community, most recently "The Mottingham Big Local Vision and Partnership Plan" (March 2013).

There are no designated business areas but the Mottingham Local Centre and the local neighbourhood centre provide shops, services and local employment.

The area is poorly connected to the rest of the Borough and beyond. Mottingham train station is located away from the two retail centres, in the adjacent borough of Greenwich, to the north of the A20 and over 1km to the nearest part of the Mayor's 'Area of Regeneration'.

Draft Policy x: Ravensbourne, Plaistow, Sundridge Renewal Area

Proposals within the Ravensbourne, Plaistow and Sundridge Renewal Area will be expected to maximise opportunities to:

- i. support the vitality and viability of the Burnt Ash Lane and Plaistow Lane Neighbourhood Centres.
- ii. enhance linkages with other areas of Bromley and adjoining boroughs, particularly in relation to centres of employment.
- iii. protect and enhance the public realm and residential environment, particularly within the Downham Estate.

Supporting Text

The Renewal Area is characterised by a mix of suburban development, including spacious roads of large detached houses to the south of Sundridge Park Golf course, terraced housing and converted Victorian Villas north of Bromley Town, suburban private estate development and the Downham Estate, interwar London County Council (LCC) public housing. The Downham Estate lies predominantly within the borough of Lewisham, however, a number of roads covering approximately 65ha lie within Bromley and within one of the 20% most deprived Lower Super Output Areas within the English Indices of Deprivation 2015. As with the Mottingham Estate it is notable that this former LCC estate, scores well in terms of the "living environment" indices making the maintenance and enhancement of the living environment particularly important in these areas.

The Lewisham Core Strategy 2011 indicates that with their partners Lewisham will seek to strengthen the quality of life and well-being by addressing deprivation and health inequalities, highlighting a number of wards including Downham.

The renewal area is served by local centres at Plaistow Lane and Burnt Ash Lane providing local shops and services. Being a predominantly residential area, these commercial centres also provide important employment opportunities, along with the Bromley Court Hotel, and local schools.

Transport links are relatively poor, with Sundridge Park Railway Station the only stop on the link line between Bromley North and Grove Park Station. Onward journeys to employment centres in London or south to Orpington and beyond require transport changes. Improving access to employment opportunities and retaining the commercial uses in the area are important.

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