

**London Borough of Bromley – Local Plan Examination 2017**

**Council's Post Submission Documents**

**Inspector's Issue 5**

**Are the policies for housing growth and affordable housing justified, deliverable and consistent with national policy? (Questions 16 to 26)**

### Inspector's question 19

**Given the matrix in Table 3.2 of the London Plan, has the Council made reasonable assumptions about the housing densities that can be reasonably be achieved on development sites, especially when Outer London Boroughs are encouraged to increase densities?**

#### Councils Response

Policy 4 of the Draft Local Plan states that all new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places. It states that housing schemes will need to respect local character, spatial standards, physical context and density. The Council will expect new housing developments to demonstrate

*“Policy 4... f – density that has regard to the London Plan density matrix whilst respecting local character”*

Importantly Policy 3.4 of the London Plan requires new development to take into account local context and character and to **Optimise** housing output for different types of location within the relevant density range shown in Table 3.2 (the SRQ Density Matrix). The supporting paragraphs to the policy highlight that it is not appropriate to apply Table 3.2 mechanistically. Its density ranges are broad, enabling account to be taken of other factors relevant to optimising housing potential such as local context, design, transport capacity, social infrastructure, open space and play (London Plan Para 3.28). Para 1.3.1 of the London Plan Housing SPG 2016 states that “One of the key themes of the London Plan is the recognition that while the best use should be made of development opportunities, proper account must be taken of the range of factors which have to be addressed to “optimise,” rather than simply maximise, housing potential”.

It is noted in the London Plan Housing SPG (Para 1.2.3) that outer London Boroughs will need to make more of a substantial contribution to meeting their projected housing growth and overall housing need. The SPG suggests that to do this, outer London boroughs may wish to focus development in and around town centres and public transport where there is scope to deliver housing at higher densities. There are a number of site allocations within the Draft Local Plan that fall within areas which have potential to deliver housing at higher densities (for example close to town centre/high PTAL). The Council is confident that the densities of these sites reflect this and have been assessed having regard to their town centre location and high PTAL value. However, the individual circumstances of each site have also been taken into consideration in accordance with Policy 3.4 of the London Plan such as the presence of listed buildings on or adjacent to the site and the surrounding local character and context of the immediate area.

The site allocations in the plan are;

- i) sites which have come to the Council's attention as a result developers/land owners responding to the Councils Call for Sites
- ii) Council owned sites which have been identified for disposal/redevelopment, and
- iii) some large sites with planning permission.

On sites where unit numbers were proposed by developers submitting their sites, Council officers checked the densities against the London Plan density matrix and local character and context were taken into consideration together with any other relevant land designations. On Council owned sites, Council officers or consultants working on behalf of the Council submitted a call for sites form with proposed unit numbers. Again, these unit numbers were checked by planning officers. Unit numbers were revised by officers where appropriate to take into account the various considerations.

Sites that have been granted planning permission have already been through the planning process and densities would have been considered as part of the assessment of the planning application.

### Conclusion

The majority of the site allocations fit within the density matrix at Table 3.2 of the London Plan (see Table 1 at Appendix B). The NPPF section 7 Requiring Good Design states that the Government attaches great importance to good design and under para 58 that local plan should aim to ensure that developments (bullet point 3) 'optimise the potential of the site...' and (bullet point 4) "respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation" and (bullet point 6 " are visually attractive as a result of good architecture and appropriate landscaping".

The Table One below shows that almost all of the sites fall within the London Plan matrix in its Table 3.2. As such they are reasonable densities of proposed development. Where there are specific reasons, the Draft Local Plan shows a density outside the range. For site 10, the location in the vicinity of a mainline station in the town centre within the Opportunity Area justifies a high density figure. For site 1, the density is low for the reasons given in Appendix A below.

Appendix B - Table 1

Site	Site Size	PTAL	Character / setting	London Plan Density Matrix range & units for the site	Site Allocation
1 Civic Centre	1.66ha Developable area excluding old Palace	4	Suburban	45 to 130 units/ha 75 to 216 units	70 units total 12 in old palace 58 on remainder of site
2 Land adj to Bromley North Station	3ha	6	Urban	45 to 260 units/ha 135 to 780 units	525 residential units, 2000 sqm of office accommodation, space for community use, 230 sqm café/retail, transport interchange, parking.
3 The Hill Car Park	1.25ha	6a	Urban	45 to 260 units/ha 56 to 325 units	150 residential units 150sqm retail & car parking
4 Gas Holder	1ha	1a & 1b	Suburban	35 to 75 units/ha 35 to 75 units	mixed use including employment and 60 residential units
5 Land adj Bickley Station	0.85ha	2	Suburban	35 to 95 units/ha 30 to 81 units	30 units
6 Bromley Valley Gym	2.8ha	2	Suburban	35 to 95 units/ha 98 to 266 units  or on a reduced site area of approx 2.3ha after removing non residential land = 80 to 218 units	200 units re-provision of library community use gymnastic centre
7 Orchard Lodge, William Booth Road	1.8ha	3 & 4	Urban / suburban	Suburban 35 to 130 units/ha 63 to 234 units Urban 45 to 260 units/ha 81 to 468 units	250 units

<b>Site</b>	<b>Site Size</b>	<b>PTAL</b>	<b>Character / setting</b>	<b>London Plan Density Matrix range &amp; units for the site</b>	<b>Site Allocation</b>
8 Bassetts Campus, Broadwater Gardens	2.6ha	1b	suburban	35 to 75 units / ha 91 to 195 units	100 units including conversion of Bassetts House
9 Former Depot Bruce Grove	0.36ha	3 to 4	Urban	45 to 260 units/ha 16 to 94 units	30 units
10 West of Bromley High Street and Land at Bromley South	4.54ha whole site 2.89ha developable zone areas	6a	Central	140 to 405 units/ha 405 to 1170 units	Redevelopment for mixed use including 1230 residential units, offices, retail and transport interchange
11 18-44 Homefield Rise	0.75ha	4	Urban	45 to 260 units/ha 34 to 195 units	100 units
12 Small Halls York Rise	0.46ha	6a	Suburban	45 to 130 units/ha 21 to 60 units	35 units
13 Banbury House	0.27ha	2	Suburban	35 to 95 units/ha 9 to 25 units	25 residential units