

## Bromley Local Plan: Site Allocation 10

1. Following receipt of the London Borough of Bromley's comments on the information provided by the appellant in relation to Site Allocation 10 and as requested by the Inspector, a further review of the area calculations has been undertaken by Alex Richards. The following is now confirmed in response to the Council's comments.

### Area calculations

2. In relation to the area calculation, the appeal site area was previously incorrectly shown as 10,772sqm. In writing the key, the comma was placed in the wrong position and it is, therefore, confirmed that the correct site area is 1,077sqm.
3. Each layer of the previously submitted maps was digitally measured and it is confirmed that the previous calculation of "Sites of Potential Development" of 13,257sqm is correct.
4. The areas now shown on the updated enclosed maps are as follows:

Appeal Site:	1,077sqm
Conservation Area:	3,453sqm
Tree Preservation Order:	578sqm
Sites with Permission:	5,185sqm
Railway Exclusion Zone:	8,766sqm
Road Exclusion Zone:	3,607sqm
Pavements Exclusion Zone:	1,966sqm
Churchill Quarter:	7,704sqm
<b>TOTAL:</b>	<b>32,336sqm</b>

5. The total area of Site Allocation 10 is 45,593sqm. The difference between the site allocation area and the total area shown above is 13,257sqm, which comprises the "Sites of Potential Development" as shown in green on the map at page 9 of the enclosed, updated document.
6. For this area to deliver the remaining 729 homes expected by the allocation, development would need to achieve an average of 561 dwellings per hectare.

### Churchill Quarter

7. The Council has noted that the previously proposed Churchill Quarter development extended beyond the area shown on the enclosed maps. It is unclear from the Council's comments whether the previously proposed development included land not within the allocation and as such whether we should anticipate fewer than 400 homes coming forward on that site. If it is the case that the future Churchill Quarter development will contribute less than 400 homes to the allocation then clearly that

would place additional pressure on the remainder of Allocation Site 10 to achieve the delivery of 1,230 additional homes.

8. For the purposes of this exercise, however, our above density calculation has continued to assume that the future development at the Churchill Quarter will contribute 400 homes.

## **Conservation Area**

9. The appellant does not suggest that development cannot occur in conservation areas, but rather identifies this designation to have an effect on the potential of that land to be developed to a high density. This reinforces the point made previously that uniform densities of development cannot be assumed across such a wide allocation site area.

## **Over Track Development**

10. Such development is notoriously complex and expensive to deliver and only rarely occurs. The Council has not provided any evidence to demonstrate that there are emerging proposals for such development and as such the appellant maintains that it is correct to exclude this area from the calculation.
11. The appellant's calculation of potentially developable sites does, however, include the redevelopment of the ticket hall at the entrance to Bromley South station and the parade of commercial units opposite.

## **Summary**

12. The appellant maintains the conclusion previously reached, that it is clearly unrealistic for the Council to expect a uniform density of development to be achieved across the site allocation. As is inevitably the case, there are parts of the area which are more and less sensitive to development and other parts which are constrained for reasons such as site area and neighbouring land use.
13. It is, therefore, critically important for the larger developable sites in the area to accommodate the scale of development required in order for the Local Plan's aspirations to be met.