

Growth Options

G1 - How important is it to maintain a balance between housing and employment in a growing post-industrial city? What do you think the right balance is?

Securing and maintaining a balance between housing and employment is very important for quality of life and sustainable development. With too much focus on employment and economic activity in central/inner London the risk is of outer London boroughs increasingly becoming dormitory areas and experiencing economic decline and creating a need to travel to work on already congested transport infrastructure. Housing needs must be balanced against the availability of and need for employment land.

Employment in all its forms is important to Bromley. Offices in particular are under pressure from the changes to permitted development rights. Industry remains important to London, and has the greatest multiplier effect in the economy and therefore should be encouraged to be retained. It has already largely been displaced from inner London, and many of the industrial areas in outer London under significant pressure from higher value uses, in particular, residential use is a potential incentive to owners to leave industrial buildings neglected 'hoping' for residential use rather than investing in the business stock. Industrial and business estates are often located away from town centres, and have poor public transport accessibility and a higher reliance on car travel. Focusing on radial routes overlooks the complex nature of movements in outer boroughs.

While increased residential use and populations can contribute to the vibrancy of town centres, it is important that this is balanced with their primary role of accommodating retail and leisure uses, and supporting infrastructure while positively contributing to the townscape character.

G2 - If London continues to expand the housing pipeline/allocations, will that distort the balance between housing and employment? What significant effects might that have within different parts of outer London?

The impact of permitted development right changes allowing conversion of office to residential is having an impact with small businesses finding it harder to find accommodation, and a tighter supply, although this has yet to be quantified. The balance of employment and housing is very vulnerable to being distorted, as other factors such as changing retail patterns affect town centres, and the importance of other employment and uses support their role. Employment in outer London, reduced the need for residents to have longer commutes, and has a multiplier impact. An imbalance away from employment will impact quality of life, and result in a spiral of decline.

G3 - What type of workspace/employment land will be required in the future relative to trends in the existing stock? Does this require a policy approach which extends beyond London?

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- Hard to predict the precise type of workspace and employment land that will be required, however, flexible floorspace which can meet the needs of small businesses, both new and growing is important.
- An important consideration will be the loss of office space to residential following recent PD changes. The Government introduced regulations in May 2013 to extend permitted development rights allowing for a change of use from B1(a) to C3 subject to a prior approval process up to May 2016. In Bromley, minimum of 310 units were approved through this process by March 2015.
- Appropriate infrastructure will need to be provided to support different working environments, e.g digital infrastructure for home working.

G4 - In the context of meeting London's growth, what contribution should the following mechanisms make in helping to meet the challenge of delivering increased levels of housing?

Increase Outer London Densities, particularly through suburban renewal?

- May not be appropriate - Any density matrix needs to allow for flexibility to take account of local character and context and individual site constraints, therefore it is important to allow for local decision making rather than building to specific densities which may be inappropriate for the area.
- Transport links need to be taken into consideration (Low PTAL in many areas of LBB) as the radial routes do not serve the travel patterns of residents in many suburban areas. Infrastructure and bus routes/transport links would need to be significantly improved
- On very small sites the application of the density matrix may not always be appropriate, a design led approach may be more appropriate.
- This appears to be more successful in existing urban areas such as inner London where much of the resident population has access to a well-established and fully developed public transport network.
- Opportunities to promote intensification at appropriate transport hubs and nodes should be explored rather than across all sites in suburban areas.

More housing at high densities in town centres and opportunity areas/Intensification Areas with good public transport?...

- Where there is access to good public transport links and town centre facilities/services high density housing may be appropriate. While this may be appropriate in OA and IAs it should not be at the expense of local character and there may be parts of these areas where higher densities may not be possible.

Greater cumulative contribution of small scale sites...

- Small sites in LB Bromley already make a large contribution to housing supply.

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Selective release of London's Green Belt around public transport nodes for housing (or consolidation of employment)

- The release of Green Belt would be contrary to the Government's policy, recently reiterated, that the need for housing does not outweigh the importance of protecting the Green Belt. There should be a focus on a regional solution looking beyond the Green Belt. If there is to be any selective release to focus on major transport interchanges or where there is substantial capacity and not see an eating away of green belt across Outer London. Bromley maintains its position of defending Green Belt boundaries, and for this to be considered by boroughs as part of their Local Plan process.

Densification of built up areas beyond London

- London operates economically and socially as part of the broader South East and long term planning needs to be considered in this regional context with improved transport links providing linkages to employment and housing
- Infrastructure and services will also need to be provided.

G6 - Would it be worth considering growth corridors (eg as with LSCC and linked to existing/potential public transport) in terms of enabling an integrated housing/employment/cross boundary strategy...and if so, which corridors could be a focus (e.g. associated with CR2, HS1, HS2, CR1 extensions, C2C improvement, Gatwick?)

- Yes if linked to existing and potential public transport but should be the major corridors such as Cross Rail and the High Speed routes.

G7 - How can we maximise the benefits of growth regionally, sub-regionally and locally; and mitigate concerns? (e.g. provision of supporting social and community infrastructure; greater focus on place-making; re-provision in the new development of social housing)

- Seek input from local residents into the plan
- Ensure that sufficient infrastructure is planned for where growth is proposed
- The Council expects to see strategic public transport investment projects for the south east including the extension of the DLR. Road schemes projects would also be required e.g. the widening of the A21. These should be funded via the Mayoral CIL.

G8- Does the London Plan Density Matrix need to be reviewed (e.g. PTAL splits, characterisation, the ranges themselves) or is it better to keep it as a benchmark and use it to bargain for high quality/more social infrastructure/more affordable housing?

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- The character and density of urban areas varies greatly across towns and cities and Boroughs. Therefore, the density matrix can only be used as a guide and other factors such as local circumstances and public transport accessibility and capacity should also be taken into account.
- It is important to allow flexibility to take account of local context and character and allow for local decision making.
- On very small sites the application of the density matrix may not always be appropriate, a design led approach may be more appropriate.
- NB Importantly, the minimum density requirement was removed from national guidance to allow local authorities to take the decisions that are best for them, and decide for themselves the best locations and types of development in their areas
- The Council believes that the current PTAL system does not adequately address accessibility issues outside the main outer London town centres. Specifically, PTALs fail to recognise that the destinations of those living in outer London are many, varied and frequently lack the credible public transport options taken for granted in more central locations

G9 Have you any suggestions for new opportunity/intensification areas; or medium sized town centres suitable for higher density, housing led renewal/redevelopment?

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Barriers to Housing Delivery

H1 - What are the particular barriers holding back delivery of new housing in this sub region?

- Recognised that at least in London and the SE there is a skills shortage in the construction industry. However, Bromley, unlike some boroughs has delivered in excess of the London Plan (2011) housing figures.
- New transport links and infrastructure will need to be provided to support the delivery of new housing.

H2 – What is constraining the private sector from translating London’s pipeline of approved homes into completions in terms of; Developer sales practices and private sector concerns about market absorption;

The scale of land banking and the number of approved sites owned by firms that do not actually build houses;

The range and size of housebuilding firms in London and the level of competition within the development sector; and

Private sector capacity and skills shortages?

(no comment to be made)

H3 – What potential is there in Outer London for; Purpose built long term, private rented sector housing (PRS)?

- This is a policy area that the Borough will be looking at when drafting the policies for the forthcoming Local Plan. However, there has been little evidence of interest from potential providers or demand.

Specialist housing for students and older Londoners?

Housing intensification through estate regeneration schemes?

The delivery of higher density development in town centres, taking into account land ownership constraints and the surrounding suburban context?

- Given that the Town Centres tend to be the most accessible locations within the borough, Bromley already delivers and intends to deliver higher density housing in its town centres having regard to the density matrix. .

H4 – What are there practical measures boroughs can take to boost supply, such as

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providing a more certain and speedy development management process for large developments prior to and following outline planning consent (eg s106 negotiations, use of conditions and condition discharge);

greater use of CPO powers;

Wider application of the Housing Zones model to address particular local delivery challenges, working closely with the private sector and other stakeholders;

Widening the pool of identified and allocated large sites in Local Plans;

- Bromley has submitted a Housing Zone bid to the GLA which the Council hopes will be approved next month. This would assist in boosting supply, in particular, ensuring early delivery.
- Bromley's emerging Local Plan has identified sites additional to those allocated in the GLA's SHLAA. The sites were identified following a call for sites. The sites have been assessed and are currently out for public consultation.

providing a more positive and certain policy and development management framework for small scale/infill development in order to support small and medium sized house builders;

requiring large sites to be parcelled up and split between a number of different developers in order to address slow build out rates and potential land banking; and

conditioning minimum levels of housing output on large sites over a fixed short to medium term horizon.

exploring the potential scope for 'use it or lose it' powers.

H5- What potential role could local authorities play in building houses, especially on surplus public sector owned land? What are the financial and regulatory obstacles that need to be overcome to enable local authorities to contribute more directly to house building in London?

H6 - Is there an issue about skills and capacity within local authorities in delivering planning consents for large scale developments?

Part of a wider financial challenge for Councils with cuts to budgets etc. but this challenge could be assisted by increasing planning fees.